

**Consultations and Notification Responses**

Ward Councillor Preliminary Comments

**Councillor L M Clarke OBE** – no written comments

**Councillor A Hill** – no written comments

**Councillor M Hussain (Bhatti) JP** – no written comments

**High Wycombe Town Unparished**

Internal and External Consultees

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9. Other external consultee comments
10. Representations from the Neighbourhood Forum, the High Wycombe Society and others

Communities &  
Built Environment

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Wycombe District Council  
Planning & Sustainability  
Queen Victoria Road  
High Wycombe  
HP11 1BB

11 November 2013  
Your Ref: 13/05799/FULEA  
My Ref: 13/05799/FULEA

FAO Richard White

Dear Richard

**A hybrid planning application seeking detailed planning permission for the demolition of the existing buildings and mixed use development to provide 441 dwellings (362 houses and 79 apartments) 448.13m<sup>2</sup> retail unit (Class A1), 536.05m<sup>2</sup> community centre (Class D1), 211.55m<sup>2</sup> Air Training Corps building (Class D2), 9 industrial units (2819.29m<sup>2</sup> Class B1c/B8), bus hub, school drop-off, open space, play areas, landscaping, car parking, the creation of a new access from Daws Hill Lane, retention of the existing access from Daws Hill Lane. Outline planning application for a primary school and pre-school (up to 1350m<sup>2</sup> Class D1) with all matters other than access reserved**

**RAF Daws Hill Daws Hill Lane High Wycombe Buckinghamshire HP11 1PZ**

I refer to the above planning application which you are aware the County Council has been considering for some time. You have been copied into various email exchanges between the applicant's consultants and ourselves following the issuing of our previous Technical Note following an initial review of the Transport Assessment. You will also be aware that the County Council answered questions raised by WDC Members when the application was presented for information at Committee on 25<sup>th</sup> September 2013.

The planning application proposes a total of 441 (originally 433) new homes comprising a mix of 1 – 5 bed properties; 1.2Ha employment (equating to 2800sqm of B1c/B8); a village centre comprising: Retail unit of 448.13m<sup>2</sup> ; multi-purpose community building of 536.05m<sup>2</sup>; car parking and a bus hub with space for 3 buses.

The TA is based on the following to provide flexibility in the development of the Masterplan.

- Up to 445 homes;
- Up to 1.2Ha employment (equating to 2800 sqm of B1c/B8)
- Ancillary uses;
- Primary School (one form entry)
- Nursery school
- Community Facilities
- Retail Unit

The site currently accommodates 67 dwellings and sui generis land uses which I understand have previously been considered lawful and therefore should be considered as a traffic generation benchmark against which to consider the change in, and impact of, additional traffic and person trip movements associated with the current development proposal.

It was previously agreed as part of the Transport Assessment scoping process – February 2013 Rev 6 (at Appendix A of TA) by email from BCC dated 22<sup>nd</sup> March 2013 that the following level of traffic generation is associated with the consented use of the site.

Table 2.3 – Extant Land Use Trip Generation

AM Peak Hour (08:00 – 09:00)		PM Peak Hour (17:00 – 18:00)	
Arrivals	Departures	Arrivals	Departures
175	33	23	165

This was based on a Technical Note produced by Entec on behalf of Defence Estates dated 9<sup>th</sup> December 2009 which stated;

“RAF Daws Hill site includes office technical and stores buildings (totalling approximately 20,000 sqm) plus 67 housing units, High School buildings and supporting infrastructure such as community and sport facilities”

Table 2.3 of the TA is consistent with the data supplied in the Entec Technical Note on behalf of Defence Estates which was accepted at the time for the purpose of Strategic Modelling to be included to inform the Core Strategy.

Residential trip generation for the proposed development is based on surveys undertaken at Fair Ridge (227 dwellings) and Daws Lea (66 dwellings). Which recorded the following;

**Average of Fair Ridge + Daws Lea Adjusted**

	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (17:00 – 18:00)	
	Arrival	Departure	Arrival	Departure
Vehicle Trip rate (per dwelling)	0.214	0.575	0.411	0.206

The above table includes adjustments to remove the traffic generation potential associated with an existing Care Home which is also present on Daws Lea. PBA have then adjusted the trip rates further to account for the presence of a primary school on the Daws Hill development site.

The school will cater for residents of the development and given that there is no primary school on Fair Ridge or Daws Lea, PBA argue that an element of the residential trip rates recorded would account for residents taking primary school children to school. This process is described at Appendix A of the TA. The resultant further adjusted trip rates are;

Table 5.2: Development Trip Rates (not accounting for any mode shift)

	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (17:00 – 18:00)	
	Arrival	Departure	Arrival	Departure
Vehicle Trip rate (per dwelling)	0.196	0.527	0.408	0.204

Whilst there is often concern about discounting trip rates given the need for robust assessments of transport impact, in this particular case the resultant trip rates still compare favourably with a general search of residential trip rates based on the TRICS database. As such we remain content that the traffic generation potential associated with the residential element of the development proposal is acceptable.

Employment trip rates have been calculated using data obtained from the TRICS database using the employment/industrial units category. The trip rates derived from this process are set out in the following table and are also considered acceptable.

Table 5.3: Proposed Industrial Unit Trip Rates

	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (17:00 – 18:00)	
	Arrival	Departure	Arrival	Departure
Vehicle Trip rate (per 100 m <sup>2</sup> )	0.623	0.298	0.166	0.476

The resultant trip generation potential is as follows;

Table 5.4: Traffic Generation – No Mitigation Measures

	AM Peak Hour (08:00 – 09:00)			PM Peak Hour (17:00 – 18:00)		
	Arrive	Depart	Total	Arrive	Depart	Total
433 homes and 2,800 m <sup>2</sup> Industrial Units	102	237	339	181	102	283
445 homes and 2,000 m <sup>2</sup> Industrial Units	100	241	341	185	100	285
470 homes	92	248	340	192	96	281

Table 5.5: Proposed 'Worse Case' Trip Generation – No Mitigation Measures

	AM Peak Hour (08:00 – 09:00)			PM Peak Hour (17:00 – 18:00)		
	Arrive	Depart	Total	Arrive	Depart	Total
Vehicle Trips	105	243	348	186	104	290

It should be noted from the above, that the trip generations carried forward in the assessment are based on 445 dwellings and 2800 sq.m of employment. The current application proposes a slight lower level of residential development at 441 dwellings.

The above traffic generation was distributed onto the network in accordance with the distributions obtained from the County Council’s Strategic Model.

A further allowance has been made on the basis that the developer has assumed that a small number of residents on site may also would in the employment area on site (although physically separated in terms of vehicular access) and for the enhancements proposed to Public Transport. The resultant flows used in the local assessments are shown in the following table.

	AM Peak Hour 0800 - 0900			PM Peak Hour 1700 - 1800		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Car Driver	98	230	328	176	98	274

Table 1: Proposed Vehicle Trip Generation

Whilst the Council is not entirely convinced about this approach, the absolute numbers reduced by the developer from the overall traffic generation are very low. The Council therefore considers that the level of reduction will not have a material effect on the network impact analysis, particularly as the developer could be said to have overestimated overall traffic generation levels given that 441 dwellings are proposed and not 445 which have been used in the calculations.

The applicant has used data from the Council Strategic Model for High Wycombe in order to ensure that future year baseline traffic flows on the network within the study area reflect and take account of development which are committed but are not yet built out. Examples of developments included within the Strategic Model include the recently permitted Next development at Cressex Island and the mixed use development, including a coachway/park and ride at the Handy Cross Hub site (Sports Centre).

The Strategic Model runs have been undertaken to assess various baseline and development scenarios in a future (horizon) year of 2022. This is in accordance with current good practice in relation to the preparation of Transport Assessment which requires a horizon year assessment of the year of the planning application + five years as a minimum. The actual assessments for this site are based on year of application plus 9 years to better reflect the likely build out of the development. These various model runs that have been taken are listed in Section 7 of the Transport Assessment on page 53 as follows;

The following scenarios have been tested:

1. 2010 Base Year
2. 2022 Future Year
3. 2022 Future Year with RAF Daws Hill fully occupied (extant permission)
4. 2022 Future Year with Development (550 homes and 4,340 m<sup>2</sup> employment)\*
5. 2022 Future Year with Development and Improvement Package 1 (550 homes and 4,340 m<sup>2</sup> employment)\*
6. 2022 Future Year with Development (550 homes only) and Improvement Package 1\*
7. 2022 Future Year with Development (445 homes and 2,800 m<sup>2</sup> employment)
8. 2022 Future Year with Development and Improvement Package 2 (445 homes and 2,800 m<sup>2</sup> employment)

It can be seen that the model runs were initially carried out on the basis of 550 homes and 4340 sqm of employment and the level of development reduced following further development of the sites Masterplan to 445 dwellings and 2800 sq.m. Data for Scenarios 7 and 8 was only received by the applicants on the day before the Transport Assessment went to print.

For the purposes of the submitted Transport Assessment, the applicants have therefore manually distributed trip generations associated with the residential and employment uses on the site to reflect the reduction in development. They have then re-added these flows manually to the 2022 future baseline traffic flow outputs (Scenario 2 – Appendix E of TA) to arrive at a 2022 baseline + development scenario.

This is clearly not ideal where there is a strategic model present and available, but nevertheless this is the traditional way (where a model is not available) to determine future year 'with development' traffic flow data which is then carried forward to capacity assessments. The manual adjustment process is explained at Appendix G of the TA. The way they traffic movements associated with the site have been distributed across the network is however entirely consistent with the distribution of development traffic by the Strategic Model under scenario 5 and on balance is therefore considered to be fit for purpose.

In order to test this conclusion, the Council requested further information from the applicants consultants to show how their manual approach to add development traffic to the 2022 baseline flows differed from the flows shown under scenario 7, which should have ideally been used but the model outputs were received late.

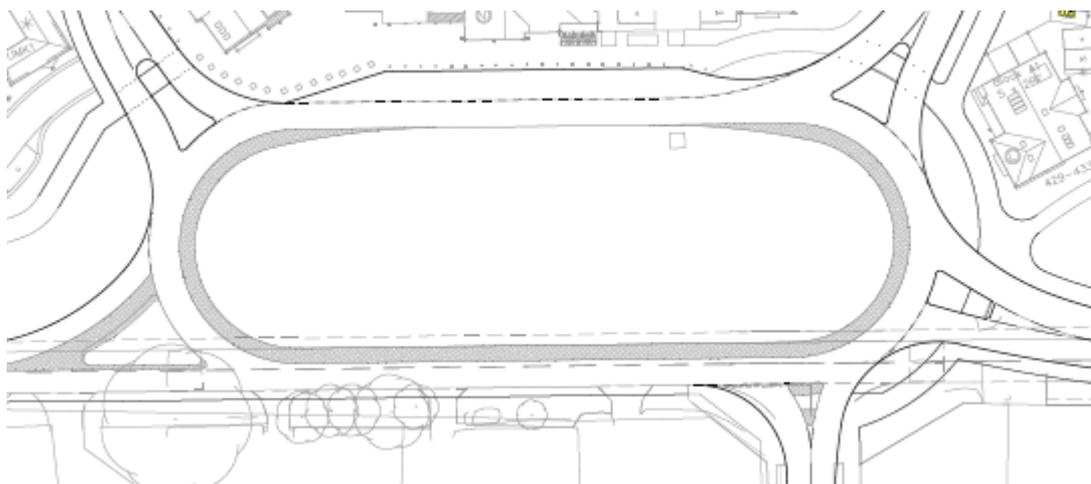
This information has shown that there are some differences in flows across the study area with some flows increasing and others decreasing. It is however important to understand that the differences are mainly due to the redistribution capabilities of the Strategic Model where conditions are congested. Where capacity on a road is increased as a result of improvements, as may be the case at the Daws Hill Lane junction with Marlow Hill, the model reflects this increase in capacity by redistributing some background traffic back onto Daws Hill Lane for instance, where those traffic movements may have previously used a different route. It is difficult to say that any redistributed background flows onto parts of the network that are improved as a result of the development are directly related to the development.

Nevertheless, the County Council has requested sensitivity capacity assessments of the network within the study area based on the network flows shown in Strategic Model Scenario 7. These results will be reported as an update before Committee.

However, the Transport Assessment (based on the manual addition of development traffic to the 2022 baseline network flows) shows the following network performance with and without development.

**Site Access roundabout.**

The site access roundabout actually takes the form of an elongated roundabout or lozenge as shown in the extract from drawing 25263/005/001 Rev B;



The TA reports the results of the capacity assessments of the junction with development only, as the junction does not currently exist on page 58;

Table 8.2: Residential Site Access ARCADY Results 2022 Future Base With Development

	AM Peak			PM Peak		
	RFC (%)	Delay (s/pcu)	Queue (pcu)	RFC (%)	Delay (s/pcu)	Queue (pcu)
Daws Hill Lane East	79	18	4	87	26	7
Daws Lea	2	6	0	3	6	0
Daws Hill Lane West	73	10	3	89	22	8
Secondary Site Access	45	13	1	6	9	0
Primary Site Access	29	9	1	11	7	1

The above Table indicates that the junction will perform well in the weekday AM peak hour with a maximum degree of saturation of 79% (85% is the maximum desirable) and with minimal queuing. In the PM peak the operation is slightly worse with degrees of saturation on both Daws Hill Lane arms which do slightly exceed the desirable maximum. However when considering whether a junction’s performance is acceptable it is necessary to consider both degree of saturation and the level of queuing reported. It should also be remembered that the

test that we now have to work to in assessing the impacts of development as set out in paragraph 32 of the National Planning Policy Framework (NPPF) is that;

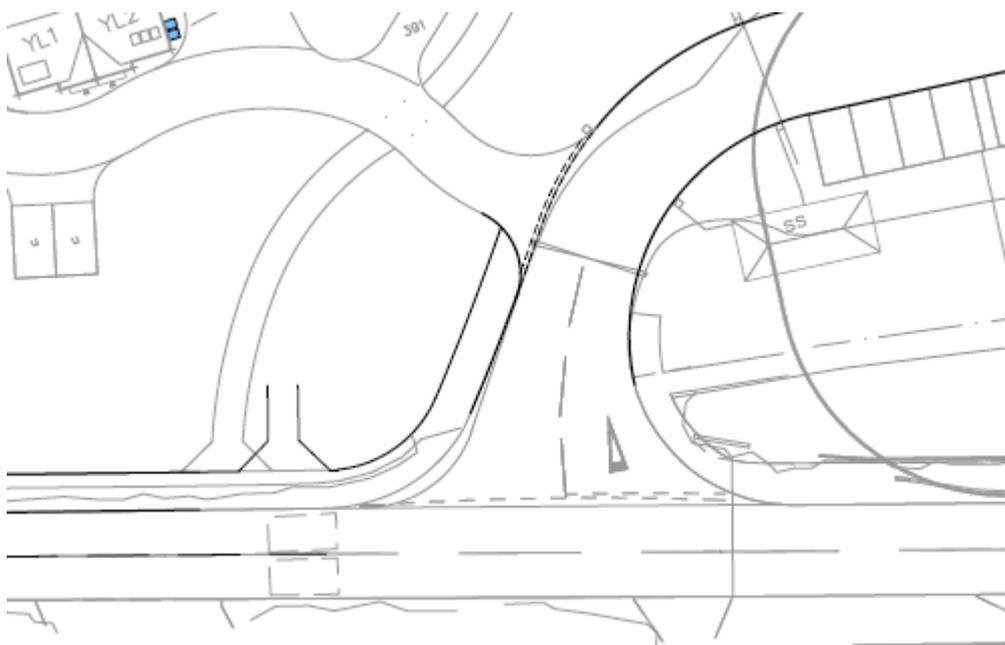
32. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. **Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.**

The fundamental requirement as I have highlighted above, is that developments can only be refused on transport grounds where the impact is severe. Looking at the degree of saturation and resultant small queuing reported in Table 8.2 could not be considered severe.

### **Daws Hill Lane/Commercial Site Access.**

In addition to the main “lozenge” junction which serves the residential (and ancillary uses) element of the site, a second simple priority junction is retained to serve the relatively small amount of employment development also proposed. This is an existing simple priority junction which has no ghost island right turn lane facility and is located a short distance to the east of the main site access along Daws Hill Lane. An extract from drawing 25263/005/001 Rev B showing the junction arrangement is set out below for ease of reference.



The results of the capacity assessment of this junction are reported in Table 8.4 of the TA on page 59 as follows;

Table 8.4: Commercial Site Access ARCADY Results 2022 Future Base With Development

	AM Peak			PM Peak		
	RFC (%)	Delay (s/pcu)	Queue (pcu)	RFC (%)	Delay (s/pcu)	Queue (pcu)
Site Access	4	16	1	6	18	1
Daws Hill Lane East	3	5	1	1	5	1

With reference to my earlier explanation of the NPPF requirements and normal operating thresholds for a junction it can be seen that this junction operates well within capacity with minimal reported queuing.

### **Daws Hill Lane/Marlow Hill & Marlow Hill/Marlow Road Gyratory junctions**

These junctions operate as part of a signal controlled network and therefore it would not be appropriate to assess them separately. These junctions form a critical part of the local highway network and it is essential that we can be satisfied that the development will not have a severe impact in terms of capacity, delay and queuing.

Table 8.5 of the TA on page 61 reports the results of the capacity assessments of the junction in the horizon year of 2022 with and without development, but correctly includes the potential traffic associated with the extant uses on the RAF Daws Hill site in the scenario without development. The results show;

2022 Future Base + Extant	AM Peak			PM Peak		
	RFC (%)	Delay (s/pcu)	Queue (pcu)	RFC (%)	Delay (s/pcu)	Queue (pcu)
<b>Marlow Hill / Daws Hill Lane Junction</b>						
Marlow Hill SB n/s lane	113	238	90	115	268	90
Marlow Hill SB o/s lane	111	230	58	115	277	63
Daws Hill Lane	102	106	35	82	28	11
Marlow Hill NB right turn lane	55	22	7	88	31	14
<b>Marlow Hill Gyratory</b>						
Marlow Hill SB n/s lane	89	24	10	101	83	29
Marlow Hill SB o/s lane + flares	97	35	19	103	86	31
Marlow Hill NB n/s lane	107	177	42	115	279	77
Marlow Hill NB o/s lane	107	175	42	114	267	74
Marlow Road	59	25	5	83	26	10
2022 Future Base + Dev	AM Peak			PM Peak		
	RFC (%)	Delay (s/pcu)	Queue (pcu)	RFC (%)	Delay (s/pcu)	Queue (pcu)
<b>Marlow Hill / Daws Hill Lane Junction</b>						
Marlow Hill SB n/s lane	112	229	85	115	274	95
Marlow Hill SB o/s lane	111	230	58	115	279	64
Daws Hill Lane	114	267	79	76	25	9
Marlow Hill NB right turn lane	53	21	7	93	40	16
<b>Marlow Hill Gyratory</b>						
Marlow Hill SB n/s lane	91	26	19	100	70	26
Marlow Hill SB o/s lane + flares	96	34	27	102	77	28
Marlow Hill NB n/s lane	106	158	39	117	307	85
Marlow Hill NB o/s lane	106	162	38	117	299	83
Marlow Road	58	25	5	84	27	10

It can be seen that the junction is currently operating in excess of capacity (in red) in both peaks and as a result extensive queuing is reported (in orange) on some links. It should be noted that the desirable maximum degree of saturation for a signal controlled junction is 90% as opposed to 85% for a non-signal controlled junction.

The comparison of the results with and without development, suggests that the development has a significant impact on Daws Hill Lane in the AM and PM peak as well as smaller impacts on Marlow Hill NB and SB.

As a result of these impacts the developer has proposed a number of improvements to the junctions which are summarised as follows;

### Increased Capacity for the Left Turn Movement from Daws Hill Lane to Marlow Hill

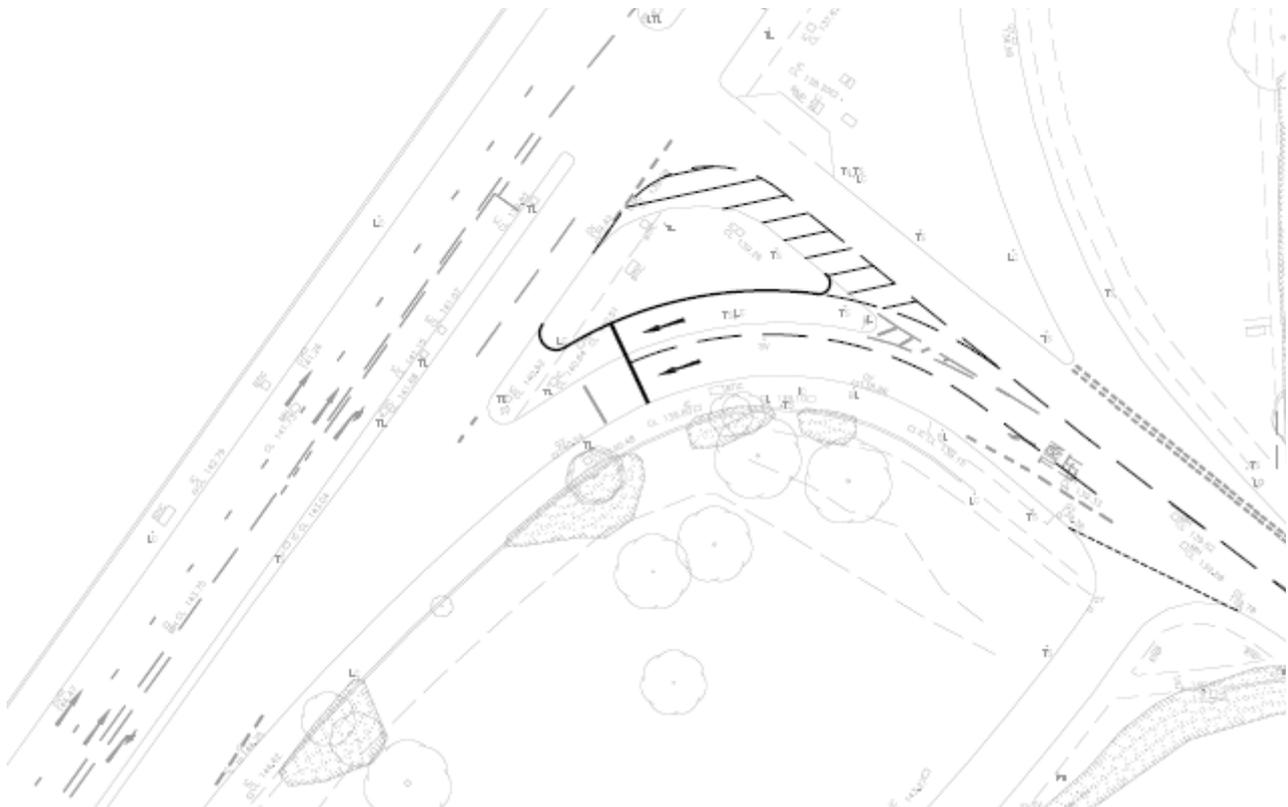
- 8.4.9. The exit from Daws Hill Lane onto Marlow Hill is currently 4.9m wide. Some vehicles use it as a two lane exit, however larger cars, vans, HGV's and less confident drivers use it as a single lane. The proposals are to widen the approach to 8m to allow all vehicles to use it as two lanes, therefore increasing capacity.

### Marlow Hill Gyratory Improvements

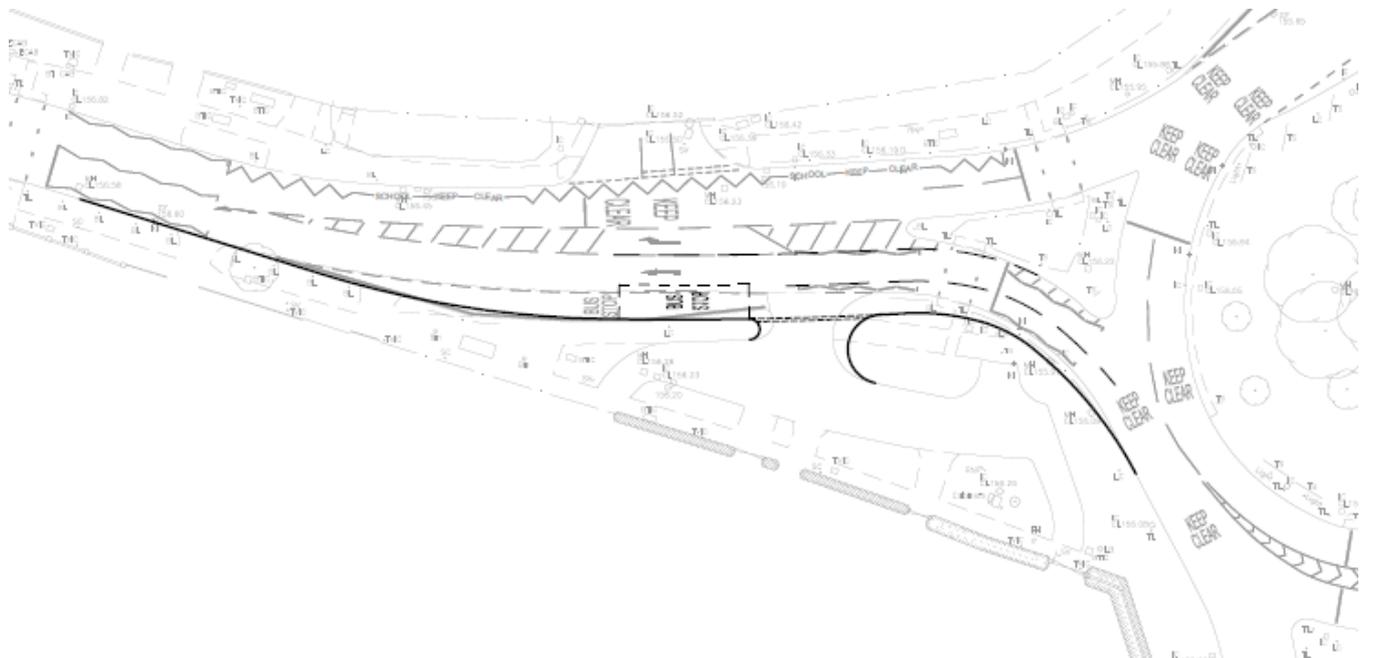
- 8.4.10. The Marlow Road exit from the gyratory will be widened to increase capacity for traffic routing to Marlow Road.

The improvements to the junctions are shown on drawing 25263/005/002 and an extract is shown below for ease of reference;

Daws Hill Lane exit widening



Marlow Road widening.



The capacity assessments have been updated to reflect these network changes and re-run. The results of the capacity assessments of the altered network are shown in Table 8.7 of the TA on page 63 and are as follows;

Table 8.7: Daws Hill Lane / Marlow Hill Junction and Marlow Hill Gyratory Improvements LINSIG Assessment Results

2022 Future Base + Dev	AM Peak			PM Peak		
	RFC (%)	Delay (s/pcu)	Queue (pcu)	RFC (%)	Delay (s/pcu)	Queue (pcu)
<b>Marlow Hill / Daws Hill Lane Junction</b>						
Marlow Hill SB n/s lane	112	229	85	115	276	95
Marlow Hill SB o/s lane	111	230	58	115	277	63
Daws Hill Lane	98	61	26	67	21	8
Marlow Hill NB right turn lane	53	21	7	95	48	18
<b>Marlow Hill Gyratory</b>						
Marlow Hill SB n/s lane	92	29	12	97	49	21
Marlow Hill SB o/s lane + flares	96	32	21	99	54	21
Marlow Hill NB n/s lane	106	162	39	113	246	71
Marlow Hill NB o/s lane	106	158	38	112	231	67
Marlow Road	58	25	5	85	27	10

To assist understanding I have highlighted some of the information as follows;

- **Yellow** is used where the results with development and improvement are the same as the base situation without development. i.e. no change.
- **Green** is used where the improvements to the junctions have had a positive effect on junction performance and queuing when compared to the base situation i.e. development traffic is more than offset on these links;
- **Red** is used where performance remains worse than the situation without development.

It can be seen that the following the improvements proposed by the developer the operation of the junction is mostly neutral or positive when compared to the base situation. There are

however some links where either degree of saturation or queuing increases. However, it is important to remember the test in paragraph 32 of NPPF in evaluating the results. Considering the red highlighted links in more detail indicates that the actual increases in delay and queuing are very small and could not in the Council's opinion be considered to represent a severe impact on the junction. The red highlighted areas typically show an increase in the number of vehicles in a queue of only 5 vehicles.

In summary the Council is satisfied that the mitigation works proposed to these junctions are sufficient to ensure that the development does not have a severe affect on their operation.

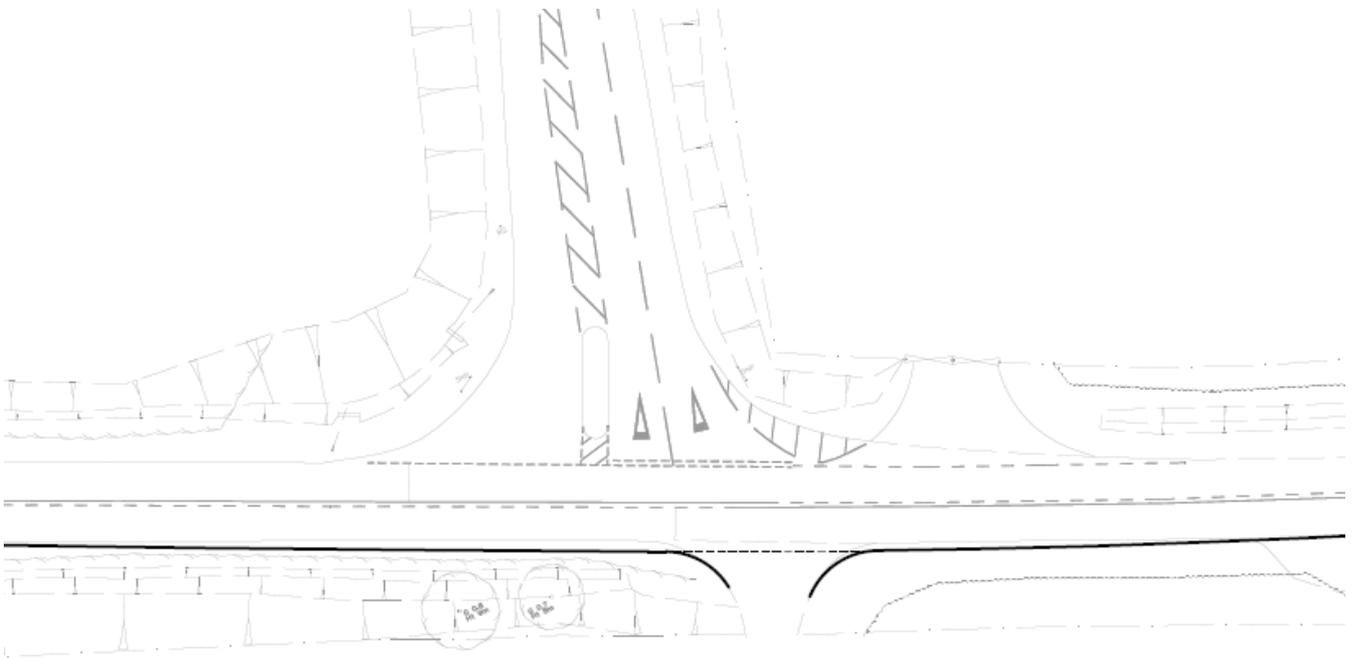
**Abbey Barn Lane/Heath End Road.**

This junction takes the form of a simple priority junction and lies to the east of the site along Heath End Road. The operation of the junction is summarised with and without development in Table 8.9 on page 64 of the TA as follows;

2022Future Base + Extant	AM Peak			PM Peak		
	RFC (%)	Delay (s/pcu)	Queue (pcu)	RFC (%)	Delay (s/pcu)	Queue (pcu)
Abbey Barn Lane Left Turn	132	465	48	103	194	11
Abbey Barn Lane Right Turn	130	480	33	101	228	8
Heath End Road Right Turn	31	6	2	36	6	2
2022Future Base + Dev	AM Peak			PM Peak		
	RFC (%)	Delay (s/pcu)	Queue (pcu)	RFC (%)	Delay (s/pcu)	Queue (pcu)
Abbey Barn Lane Left Turn	137	514	53	112	266	16
Abbey Barn Lane Right Turn	134	533	33	110	300	12
Heath End Road Right Turn	33	6	2	38	6	3

It can be seen from the above that the Abbey Barn Lane arm of the junction is operating well in excess of capacity with and without development in both peak hours with significant queuing reported in the AM peak hour in particular.

A scheme has been prepared by the developer to carry out some small improvements to the junction which are shown on drawing 25263/005/005 an extract of which is below for ease of reference;



It can be seen that a small amount of widening is proposed to Heath End Road. The capacity assessments have been rerun with this widening in place and the results are summarised in Table 8.10 on page 65 of the TA as follows;

Table 8.10: Abbey Barn Lane / Heath End Road Junction with Improvements PICADY Summary Results

2022Future Base + Dev	AM Peak			PM Peak		
	RFC (%)	Delay (s/pcu)	Queue (pcu)	RFC (%)	Delay (s/pcu)	Queue (pcu)
Abbey Barn Lane Left Turn	129	430	45	101	181	11
Abbey Barn Lane Right Turn	127	450	28	100	210	8
Heath End Road Right Turn	32	6	2	37	6	2

It can be seen that whilst the improvement is questionable in real terms given the very limited change that it will have on the ground, the capacity analysis evidence base does suggest that it would offset the impact of development traffic if the results in Table 8.10 are compared to those set out in Table 8.9.

In summary the results of the network impact assessment of the development show that the development will not have a severe impact on the highway network compared to the baseline situation subject to;

- Improvement to the Marlow Hill/Daws Hill Lane and Marlow Hill/Marlow Road junctions as shown in principle on drawing 25263/005/002;
- Improvements to the Heath End Road/Abbey Barn Lane junction as shown in principle on drawing 25263/005/005

## Additional mitigation details

In addition to the highway improvements detailed above, the proposed development offers further measures that are designed to mitigate the impact of the development and these have been informed by the adopted Development Brief for the site as well as the requirements of the Southern Quadrant Transport Strategy, adopted by this Authority in December 2012.

The Southern Quadrant Transport Strategy (SQTS) sets out a ten year vision for the management of transport in the southern area of High Wycombe. The SQTS establishes priorities and schemes that will deliver benefits for all and is consistent with the objectives of the County Council's 3<sup>rd</sup> version of its Local Transport Plan (LTP3) including the TRIM strategy;

**T**ransfer  
**R**eroute  
**I**ntercept  
**M**anage

The development permitted at the Handy Cross Hub site is an integral part of this strategy as it provides a local and regional public transport hub and park and ride which seeks to transfer trips from the private car to public transport. The SQTS also refers specifically to the development proposed on the former RAF Daws Hill site and sets out principles which should be secured in the event that planning permission is granted.

The developer has been mindful of the requirements of the SQTS in preparing its submission of the planning application. The developer is willing to provide for the following infrastructure (either directly or indirectly) which is consistent and complimentary to the requirements of the SQTS;

- A new signalised pedestrian crossing on Daws Hill Lane adjacent to the school. This provision will provide a safe and controlled crossing point for pupils who originate from the surrounding area
- Upgrades to the existing public right of way which bisects the two halves of the site.
- A new pedestrian/cycle link through the site linking Daws Hill and the public right of way to Wycombe Marsh to encourage walking and cycling as a mode of travel;
- Localised footway widening on the northern side of Daws Hill Lane to encourage walking and cycling;
- Improvements to existing services to provide a high quality and frequent bus service and associated infrastructure to RAF Daws Hill by diverting the existing route 36 via Handy Cross and High Wycombe Railway Station together with increased bus frequency to 15 minutes and extended operating hours.
- A Daws Hill public transport bus, cycling and walking route which will provide a congestion free route for public transport services, pedestrians and cyclists between Daws Hill Lane and the Handy Cross Hub. The applicant has agreed to support this financially. The justification of the link is centred around improving public transport services in the area. Securing the viability of these services through the delivery of a frequent, high quality, reliable and connected service will reduce the need for financial subsidies in the future and contribute greatly to easing congestion on the adjacent highway network.

## Site layout

After much negotiation, the County Council is now satisfied as to the adequacy of the layout of the proposed site and list below the elements which have been considered:

- Geometry of the internal roads is now such that all public transport vehicles can proceed through the site with a suitable turning facility at the ATC site being made available. In general it is considered that the layout is future proof for the potential adjacent residential development site, Abbey barn South.
- It is now considered that the various tracking plans indicate that as well as being able to accommodate public transport vehicles, the site layout is also able to accommodate refuse, pantechnicon and delivery vehicles together with adequate manoeuvring provision.
- The main routes throughout the site offer pedestrian provision in the form of footways on both sides of the carriageways
- Pedestrian provision has been included within the employment site, together with a rear access pedestrian provision.
- Adequate parking and turning provision has been provided for both the residential and employment elements of the proposed site.

All visibility splays at the various junctions for both pedestrians and vehicles are in compliance with the required standards.

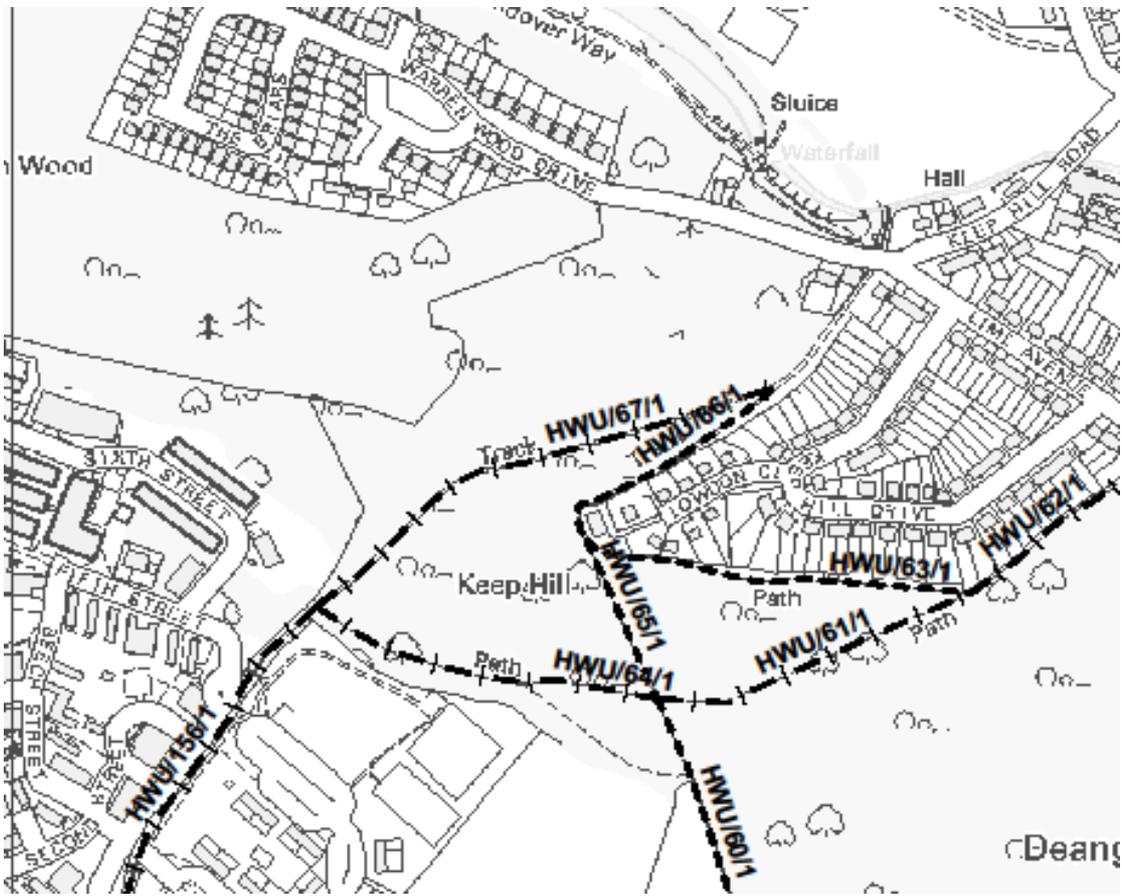
## Rights of way

Chapter 7 of the Design & Access Statement makes reference (7.142) to upgrading/improving the public rights of way on the east of the site. Bridleway No. 67 High Wycombe provides the ideal opportunity to deliver excellent walking and cycling options for the new residents at RAF Daws Hill and other local residents, linking to Warren Wood Drive, then into the Rye recreation ground along relatively quiet roads and through to the town centre (see plan). This would take cars off the road and provide multiple health benefits for local walking and cycling. Moreover, there are led health walks around the Rye through the 'Simply Walk' Scheme and other opportunities for 'access to nature' in surrounding woods.

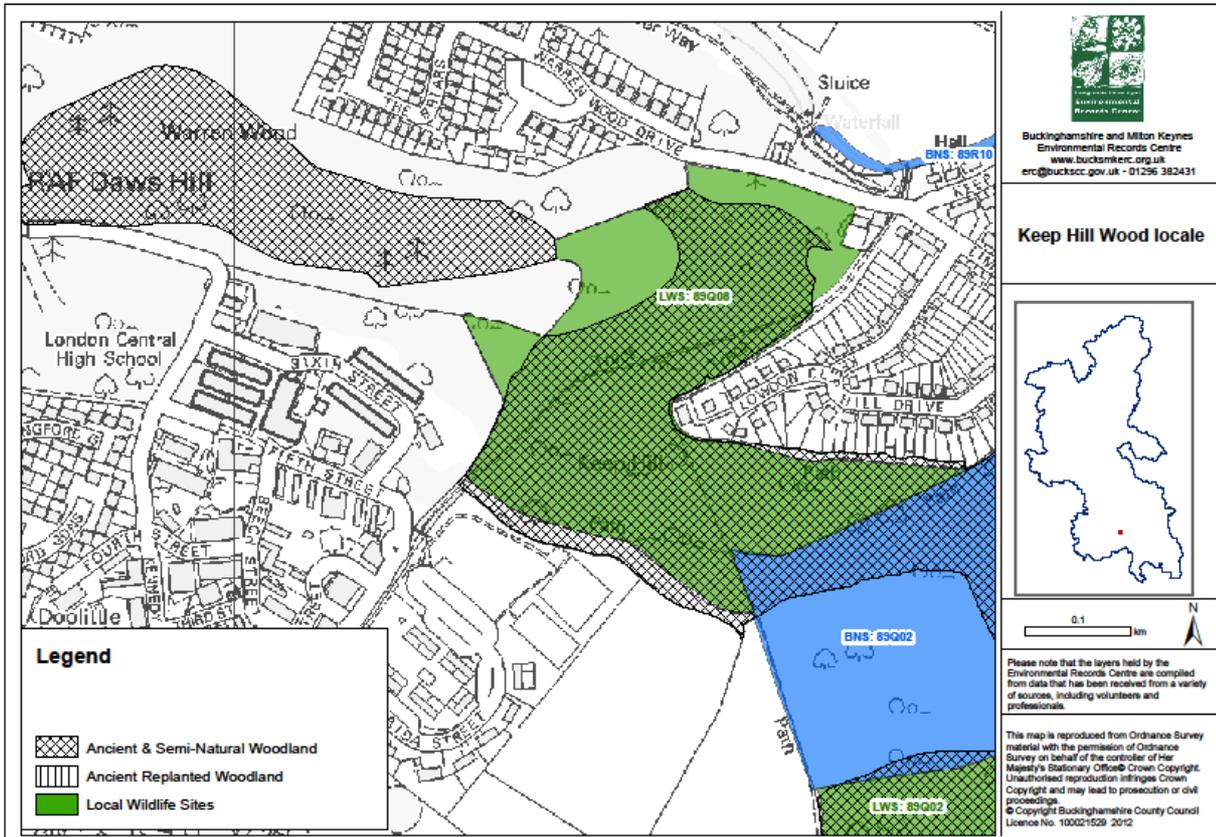
Key to improving this bridleway to be suitable for users with push chairs, mobility scooters, walkers and cyclists, is to upgrade the surface. In addition, it has been mooted, in discussions outside the application, to 'snake' the bridle path in order to reduce the steepest gradients. However, the woodland has sensitive and protected ecology and heritage designations so any proposal for a path that intends to alter ground conditions or remove trees in order to construct, would need permission from Natural England and English Heritage.

Ecologically, the woodland is a County Wildlife Site and is ancient woodland (see map). It also sits between Warren Wood and Deangarden Wood both of which are ancient woodlands. It is understood to be Wycombe District Council owned and in a 5-year woodland grant scheme, managed by their ranger service. It also has heritage designations. It is a Grade 2 listed Registered Park and Garden, part of Wycombe Abbey (national designation) and is a Conservation Area (local designation), so further consultation with English Heritage, BCC Archaeology and WDC Listed Buildings and Conservation Officer is suggested.

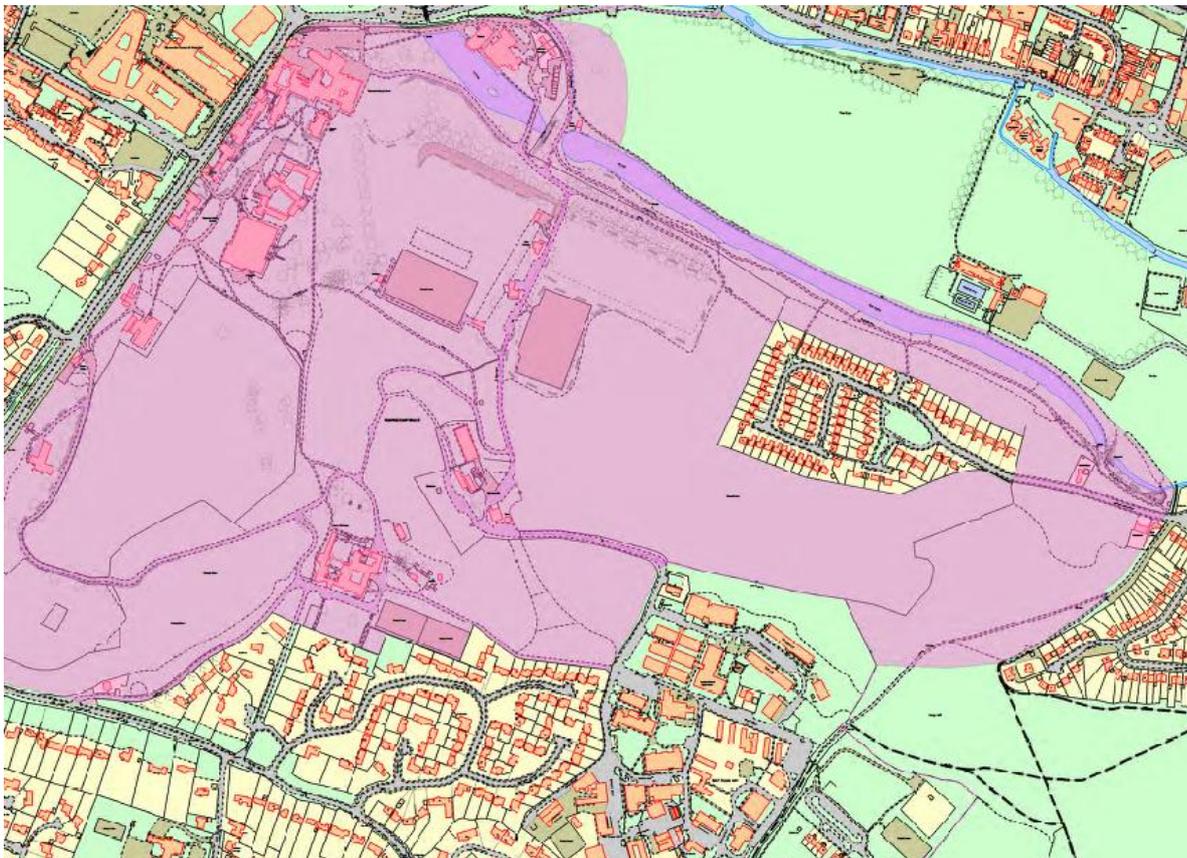
We would recommend any approval has a condition that improves this bridleway to provide a primary sustainable transport link to the Rye and town centre, details of which should be agreed at a later date. With regard to the 'zig-zag' route the integrity of the existing bridleway is not be compromised by construction of the new route.



Rights of Way Plan



## Ecological Designations



Heritage Designations Purple = Registered Park & Garden

## **Public Transport**

In order to promote sustainable means of travel as fully as possible, the development should provide enhancements to the local bus network. Presently passed by only an hourly (Monday to Saturday) service, the development proposes a number of measures to improve the frequency and availability of the service, as described in the Transport Assessment.

These improvements include providing subsidy for an increased level of service of every 15-20 minutes between the site and High Wycombe town centre (via the proposed Handy Cross Hub for regional connections) with a less frequent projection to Bourne End which would complement the existing service between there and the site. The operational day would also be expanded beyond (circa, on weekdays) 0830 and 1705, thereby providing an alternative to private car trips to the town centre and wider regional destinations. Contributions to this public transport scheme require phasing in such a way that a reduced service enhancement, for example the longer operational day, can begin at an early stage of the development, before roads infrastructure is available for buses.

It is essential the site is accessible to buses, in order to directly serve the development at an early stage during build-out. The swept path contained within the Transport Assessment indicates that a single deck bus (the model used is a Scania Omni-City of 12 metre length) is able to be driven to the Eastern section of the site and turn adjacent to the ATC building. This turning area adjacent the ATC needs to be kept clear of obstructions to allow efficient bus operation. Sufficient space also needs to be provided for the terminating buses (typically two per hour) to wait without impeding general traffic. This route must be available at an early opportunity, with measures to reduce and enforce on-street parking to aid reliability. A through route, beyond the ATC building, is possible and needs to be protected. Should the service eventually be combined with the Park & Ride service, it may become necessary at that point to operate the service using low-floor double-deck vehicles in order to provide sufficient capacity for all passengers. Double deck vehicles, such as the ADL Enviro 400 or Wrightbus Gemini 2, would not typically be of greater length or width than the vehicle used for the Swept Path, but vehicle height at up to 4.4 metres needs to be considered. This would include being mindful of the need to manage overhanging tree branches or by planting in such a way that branches would not encroach on the bus route.

Usage of the bus service is project at 33 passenger trips in the AM peak, assuming a 15-minute service and implementation of a travel plan. Should these passengers return in the PM peak, 66 peak trips will be made via public transport.

A 3-bay bus hub is proposed, with the intention of this replacing the practice of school buses setting down on Daws Hill Lane itself, and using local residential roads for set down purposes. This would new bus hub would be approximately 700 metres from the school, and the suitability of this and walking route needs to be ensured.

## **Travel Plan**

The Travel Plan Coordinator contact name and details must be forwarded to Sustainability Services of the County Council at the earliest time prior to occupation. Welcome Pack drafts should be sent to Sustainability for advice.

With regard to the surveys, these must be undertaken on an annual basis and recorded by the Travel Plan Coordinator using the iTrace monitoring tool for residential developments. The baseline survey should take place within 3 months of first occupation. It is acceptable to undertake the baseline survey within 3 months or at the trigger point of 75 – 100 units, whichever occurs soonest. The annual surveys should continue to be recorded for a minimum of 5 years post the end of the construction of the last phase of the development. The fees for the ongoing support for the Travel Plan from Sustainability Services are £1000 per annum. This payment should be paid until 5 years after the completion of the last phase of construction. The document must state clearly that this is agreed.

### **Addendum TA**

An Addendum to the Transport Assessment has recently been submitted to provide further clarification on a number of matters, including the impact of development on settlements to the East of the site, a concern raised by WDC Members at Committee on 25<sup>th</sup> September. A separate highways and transportation response will be provided as an update following the consideration of these issues in further detail.

A handwritten signature in black ink, appearing to read 'C. Smith'.

**Senior Development Management Officer  
Development Management  
Planning Advisory & Compliance Service**

Place Service

**Service Director : John Lamb**

**Buckinghamshire County Council**  
County Hall, Walton Street  
Aylesbury, Buckinghamshire HP20  
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Telephone 0845 2302882  
[www.buckscc.gov.uk](http://www.buckscc.gov.uk)

Mr Richard White  
Principal Development Management Officer  
Wycombe District Council

Date: 11/11/2013

Dear Richard

**BUCKINGHAMSHIRE COUNTY COUNCIL RESPONSE TO RAF DAWS HILL  
APPLICATION (13/05799/FULEA)**

Thank you for your invitation to comment on the above application. This response incorporates all aspects of the County Council's service areas with the exception of our statutory highways and rights-of-way responsibility. We will issue our highways/RoW advice separately as dialogue with the developer and technical work associated with the proposals are finalised. Our comments are made in the context of our Strategic Objectives, which oblige us to "*ensure the local Council and its Councillors protect the interests of Buckinghamshire residents at local, regional and national levels*" and to "*protect the county's special environment*".

**Strategic overview**

The County Council supports the principle of development on the Daws Hill site. This has been established through our involvement in the adopted Development Brief for the site and the inclusion of the site in the Southern Quadrant Transport Strategy.

With regards to the application submitted, we are generally satisfied that it both fulfils the aims of the Development Brief and has the potential to contribute to the delivery of the SQTS (subject to the details of our highways advice). However, we wish to emphasise that the proposals could be improved, and in certain areas considerably so. Whilst we do not sustain an objection on any of these grounds, we would urge the District Council to consider our recommendations when determining the application and, if it is minded to approve, seek to resolve any outstanding issues with the applicant through conditions or via reserved matters. BCC will of course continue to provide the necessary support to achieve this – the relevant contact officer in this regard is listed in each of the following sections.

**Education** (contact officer: Stephen Chainani, [schainani@buckscc.gov.uk](mailto:schainani@buckscc.gov.uk), 383863)

Buckinghamshire County Council (BCC) has a statutory duty to ensure that there are sufficient school places in its area and is the education authority for the application site. Section 14 of the Education Act 1996 describes this responsibility as follows:

“To ensure that schools in its area are sufficient in number, character and equipment to provide education suitable for the different ages, abilities and aptitudes and special educational needs of pupils of school age ...”

The increase in housing planned across Buckinghamshire is projected to put increased pressure on school places. In June 2010 BCC adopted a policy to ensure a coherent and consistent methodology for assessing the additional education infrastructure requirements generated by new housing developments. Policy CS21 of Wycombe District Council’s Core Strategy states: ‘Where implementation of a development would create a need to provide additional or improved infrastructure/facilities or would exacerbate an existing deficiency in their provision, the developer would be expected to make such provision.’ The CIL Regulations, which came into effect on the 6th April 2010, now make it a requirement for a planning obligation to meet all of the following tests:

- necessary to make the development acceptable in planning terms
- directly related to the proposed development – for example, there should be functional or geographical link between the development and the planning obligation;
- fairly and reasonably related in scale and kind to the proposed development;

A CIL charging schedule was introduced by the Council on 1<sup>st</sup> November 2012 following consultation and a Public Examination. CIL funds may be used on projects to address the cumulative impacts of developments on the wider area. School improvement projects are named on the CIL Infrastructure (R123) list which includes the provision of additional primary and secondary school places at existing schools. However, as set out in the Planning Obligations SPD adopted in April 2013, there may be some developments where planning obligations are still necessary to make a development acceptable in planning terms:

*BCC will make an assessment of the need for education contributions on large sites of at least 100+ dwellings where it may be necessary to provide either new on-site provision or expansion of an existing school in the area to meet the direct needs of the development.*

Under CIL regulations, there are constraints on pooling planning obligations of no more than five developments towards one improvement project, and projects must not be included on the R123 list (i.e. to avoid developers paying twice for the same item of infrastructure).

The following sections will demonstrate that the proposal gives rise to the need for additional education infrastructure to enable BCC to meet its statutory duty and any planning obligations sought are in line with BCC adopted guidance on planning obligations and compliant with CIL regulations and local and national policy.

Buckinghamshire County Council is currently in the process of preparing area based plans on primary and secondary schools in Buckinghamshire. These plans will identify the requirements for additional school places resulting from housing growth planned in the District for the period to 2026.

## ***Current and Projected Capacity***

Projections of supply/demand for school places are based on Audit Commission recommendations. They are calculated for a five year period for primary schools and a 10 year period for secondary schools and are derived from the current number on roll, demographic information about births, data on planned housing and pupil number trends. Pupil demand is assessed against a school's net capacity calculation as assessed by the Department for Education (DfE).

DfE guidance on targets for surplus places states that you cannot and should not try to eliminate all surplus capacity (i.e. not all unfilled places are surplus). A certain level of surplus places is necessary to allow for volatility in preferences from one year to next (e.g. to allow for year on year changes in the number of births or the number of pupils attending independent/out county provision). While the guidance does not recommend a single 'ideal' level of overall surplus capacity, it does state that it is reasonable to aim for between 5-10% overall surplus. In line with this guidance (similar to other LAs) BCC plans for a 95% occupancy rate in schools.

The number of children generated from new housing is calculated by multiplying the number of homes for each dwelling type by the respective pupil yield rates. BCC's pupil yield rates from new housing below are based on an analysis of 2001 Census data which excludes dwellings owned outright which contain a high proportion of households made up of elderly persons (i.e. 50% of occupants in these households are aged 60+) as these are not representative of modern housing development.

Provision Type	Pupil yield rates by dwelling type per 100 dwellings				
	Flats		Houses		
	1 Bed	2 Bed	2 Bed	3 Bed	4+ Bed
Nursery	0.4	1.2	3.1	5.6	6.7
Primary	2.7	8.7	22.1	38.8	46.7
Secondary	1.6	4.9	14.8	33.0	43.6

The pupil yield rates used by BCC are in line with yield rates experienced on developments within Buckinghamshire and those used by neighbouring authorities.

### *Primary*

The proposed development site falls in the primary catchment area of Chepping View Primary School. Chepping View has a current number on roll of 419 pupils (September 2011) when compared against its capacity of 420 – a surplus of 1 place. Across the High Wycombe planning area there is projected to be a deficit of 33 places which is well below the DfE recommended range of 5% to 10%. The projections include current permissions and the additional primary places that have recently been provided at Hannah Ball School, Marsh School and Oakridge School to meet this demand. However, the overall surplus capacity does not differentiate between the available capacity across the different year groups or give an indication of the rising child population in High Wycombe - with a 3% deficit at KS1 compared to 1% surplus places at KS2. The LA is currently exploring a number of other options for expanding provision in the area.

## *Secondary*

The application site falls within the secondary school catchment areas of Highcrest School, Cressex School, St Michael's RC School, Royal Grammar School, John Hampden Grammar School and Wycombe High School. As parental choice is exercised to a greater degree at secondary level, it is appropriate to consider all secondary provision in the district. BCC estimates based on the proposed mix of homes that the scheme would generate additional demand for 145 secondary school places. Based on current projections, there is a need to provide additional capacity within secondary schools in the district. The buildings at Cressex have been future proofed to allow for further expansion. There is also potential to expand other existing secondary schools in Wycombe subject to consultation, planning permission and funding. Expansion options will need to be developed and consulted upon - in partnership with key stakeholders - as part of the development of BCC's Local Area School Place Commissioning Plans.

### ***Requirement for S106 Contributions***

#### *Primary*

Based on current pupil yield rates and proposed mix of homes, Buckinghamshire County Council (BCC) would estimate an additional demand for 23 early years and 162 primary school places. There are no places available at existing schools in the town to accommodate the primary aged children from the application site – and most are at the limits of their site. A major housing development such as on the RAF Daws Hill site will trigger the need for a new on-site primary school. This is also in line with our policy that new primary schools are provided in the heart of any new communities to support social cohesion and minimise the distance they need to travel/encourage walking to school. In order to guarantee a place at the new school to all pupils living on the development, BCC would require a one form of entry school (i.e. 210 places) with attached 26-place pre-school. The size of school is also consistent with our policy to plan new provision on the basis of whole forms of entry to reduce the need for mixed aged teaching which is unpopular with both parents and teachers. The size of the school would also allow for year on year fluctuations in population cohort sizes which is particularly volatile on new developments. With the potential phasing of the development, admissions into the new school would need to be managed carefully so that places were made available as the pupil numbers materialised.

The cost to construct a fully fitted and functioning primary school of this size is estimated at £3,653,760 - based on a space requirement of 1384sqm and the DfE cost multiplier for new schools equivalent to £2,640 per gross sqm. BCC's current policy is to open new schools at the point in which admissions into reception from within the development reach 15 pupils per year group (which we estimate to be on completion of 350 homes or four years after commencement whichever is the earlier) – sufficient to justify the opening of a new school balanced against the environmental and financial cost of making provision and transporting pupils to neighbouring schools.

The size of the primary school site and accommodation may need to be future proofed to accommodate two forms on entry in the future should there be a need as a result of future development in the area (i.e. Abbey Barn development). The approved design of the school will show how enlargement could be accommodated. The site will need to be in accordance with the specifications set out in Appendix 1. Further, a one form entry primary school requires 28 car parking spaces which includes two disabled and two visitor parking bays.

The planning statement states that BCC have agreed the illustrative layout – however, this is not yet the case. BCC has reviewed the primary school layout put forward by the developer and is awaiting clarification on a number of outstanding queries.

### *Secondary*

While the projections indicate the need for additional school places, the funding cannot be secured through planning obligations and will need to come from alternative sources (e.g. CIL funding, LA reserves and/or Government Funding). CIL regulations state that where the R123 list includes a generic item (in this case expansion of existing secondary schools) section 106 contributions should not normally be sought on any specific projects in that category.

### **Education Summary**

The scheme currently makes provision for a new single form entry primary school (including Pre-school) with a multi-use car park comprising 24 spaces for visitors to the ATC building, playing field and school.

If the Daws Hill scheme were approved, to meet legal and policy requirements BCC would require the following education infrastructure based on the proposed mix of homes:

£3,653,760 and a fully serviced site for the provision of one fully-fitted and functioning 210-place primary school with a 26 place pre-school in accordance with BCC specifications including 28 car parking spaces. BCC would intend to open the new school on completion of 350 homes or 4 years after commencement whichever is the earlier. The school would also need to be future proofed to allow for expansion to two forms of entry if further development were proposed in the area.

**Adults and Family Wellbeing** (contact officer: Steven Goldensmith, [sgoldensmith@buckscc.gov.uk](mailto:sgoldensmith@buckscc.gov.uk), 383148)

The Adults and Family Wellbeing service wish to register that access to housing for vulnerable groups such as those with Learning Disability, Mental Health, and Physical Disability should be a priority of provision in any social housing identification. The application looks to "potentially" provide up to 71 social housing units. BCC would wish for the developers to look to commit to the development a maximum of 12 units for those with disabilities. These would serve the needs of the wider Wycombe District area and be specialist in design and therefore more expensive than standard general needs developments (additional costs relating to group design, layout and staff and communal facilities). Rent would need to be accessible within Housing benefit levels. This specialised housing is focused on promoting independent living and community engagement; as such a location near to shops, community resources and bus stops would be required.

A large scale housing development such as that of the application should aim to be inclusive of the housing needs of wider "vulnerable" community and would be supported by the Adults & Family Wellbeing service if it did so.

**Landscape** (contact officer: David Green, [dagreen@buckscc.gov.uk](mailto:dagreen@buckscc.gov.uk), 382656)

One of the key principles of the design is to retain the wooded character of Daws Hill in an effort to create a garden city approach to the design of housing and the plots in the new development. This is a laudable concept as the tenets of garden city design provides more green space in a residential areas, greater biodiversity potential, the abundant tree cover lowers temperature in the summer and it is an aesthetically pleasing environment for people to live in. However, reviewing the submitted plans and sections show that this aspiration has not been achieved; this is mainly due to the development accommodating such a high density of housing which has resulted in is a high proportion of hard landscaping, for roads and parking. It is disappointing to see that more of the trees could not be integrated into the new design (this area was a former wood) and in terms of additional planting there is very little included in the streetscape, in some instances roads having a complete absence of trees and token verges. Looking through each of the design vignettes in turn:

7.1. The local centre is tucked out of the way and we question how this would be accessed. The layout is not great; the configuration is rather meandering and sinuous. It could have a square with the active edges which would be easier to navigate. There is also little in the way of green space.

7.2. Daws Approach, 7.3. Lime View, 7.4. Daws Response, 7.5. Cord Lanes: There is again an abundance of paving hard surfaces for drives, roads and parking bays (there is a rather broad palette of pavers and materials). Given the amount of hard landscaping we question where there should be more permeable paving to avoid accumulation of surface water and provide some form of water attenuation. The appearance and function of these areas would be improved if softer landscaping (i.e. planting of verges and trees) could be added to the streets - for instance Cord Lane doesn't have any significant planting or trees along the road.

Overall the palate of plants for the development is adequate - primarily the use of native species - the one exception is use of *Cyprus sempervirens* in Cords Type M which seems slightly incongruous. We do however question the perimeter boundaries - it is not clear why there is defensible planting on the eastern side and what it is intended to keep in or out. In general terms the perimeter planting provides an aesthetic value and demarcates the site but on the other hand it reinforces the enclosure of this development, which was an aspect of Daws Hill when it was a military base. The development already has poor access/permeability via the road network and maintenance of boundaries makes this feel like a gated community. There would be merit in trying increase access through these boundaries to integrate the development into High Wycombe and the surrounding landscape as per our Rights of Way comments.

9.0. The play spaces -woodland works, senior trim and junior trim are not adequate for the number of residents about to inhabit this space.

Daws Hill Park (9.1) is the only area Green Infrastructure of any notable size. The layout for an adventure playground looks good; however this is not a big enough space to accommodate other things to take place to support multifunctionality. The Design of Daws Hill Park could have made more of the view along the avenue of Limes outside of the site adjacent to the site forming a site line.

The design could also have made more of the history of the site as a former US base, perhaps fossilising the roads or pathways - e.g. Kennedy avenue (with its previous incarnation before

as a woodland ride which connected to the design landscape) however the completely new design has erased acknowledgement of this.

**Green Infrastructure** (contact officer: David Feeney, [dfeeney@buckscc.gov.uk](mailto:dfeeney@buckscc.gov.uk), 383049)

Account should be taken of the Buckinghamshire Green Infrastructure Strategy 2009 and Green Infrastructure Delivery Plan 2013, looking in particular at how the site/proposed development impacts upon and integrates within the strategic GI network. These documents are referred to in the Core Strategy and Site Allocations DPD (2012).

Given the size of the development and its central location, it is of strategic importance for GI, therefore the proposed development should clearly demonstrate how the site will retain, protect and enhance the green infrastructure network which is not evident in the planning application. WDC's local plan specifically refers to Green Infrastructure in: Policy CS 17 (Environmental Assets) requires the identification, retention and enhancement of Green Infrastructure assets.

Wycombe District Site Allocations DPD states the following:

DM10 – Green networks and GI

1. All development should retain, protect and enhance the Green Infrastructure Network paying special attention to the conservation and enhancement of biodiversity, recreation and non-motorised access.
2. All development (where appropriate) will be required to contribute towards the:
  - a) improvement of the Green Infrastructure Network,
  - b) delivery of Corridor Opportunity Areas (as identified on the proposals map) and
  - c) improvement of Biodiversity Opportunity Areas (as identified in the Biodiversity Action Plan).
3. All development proposing new green spaces or green links should be provided in a way that retains, reinforces or creates links within and to the Green Infrastructure Network so as to promote recreation, biodiversity and non-motorised access.
4. Where Reserve Locations for Future Development (as identified in the Core Strategy) overlap with the Green Infrastructure Network, any future development on those sites should be designed to provide strong and continuous links to the surrounding parts of the identified network.

Consideration should be given to adjacent GI network – Warren Wood, Keep Hill Wood, Dean Garden Wood, The Rye & Holywell Mead, Wycombe Abbey estate, and corridor connections towards Wycombe Marsh – and ensure that the strategic GI network in Wycombe is retained, protected and enhanced, as per WDC policy. There appears to be little consideration of the impacts of the development on the surrounding GI network, and how these may be mitigated. A development of this size is likely to have detrimental impacts upon existing adjacent green spaces due to a major increase in communities using them and this needs to be managed. Therefore assessment of these impacts, provision for impact management and necessary mitigation needs to be made. Also, there are clear opportunities for enhancements to the GI network surrounding the development site, and a development of this scale should provide contributions towards improving the GI Network (DPD policy DM10).

There is reference to a strategic link from the Daws Hill development to the Rye within the Design & Access Statement, using an existing bridleway (no.67) via Keep Hill Woods. This link is identified in the GI Delivery Plan 2013 as a strategically important connection. However it is unclear how the development will deliver this and we request more detail on this matter. In

principle, sensitive enhancements to the existing bridleway, taking full account of the sites environmental constraints/assets and of technical advice on ecology, landscape, strategic access and historic environment, would be desirable.

Overall the development incorporates minimum requirements for green space within the site itself. It would be desirable to see more GI space within the development in character with the current site and to alleviate pressure on neighbouring GI network. A creative mix of green spaces with community purpose is welcomed within the development – (i.e. park/nature reserve, allotments, woodland walk, amenity green space etc.). More detail is requested on how the green spaces will be managed and maintained in the future, and how this will be funded.

**Archaeology** (contact officer: Sarah-Jane Farr, [sjfarr@buckscc.gov.uk](mailto:sjfarr@buckscc.gov.uk))

We do not have any further comments to make regarding below ground archaeological issues and confirm that the results of the trial trenching were negative and no further investigations are required.

Regarding the significance of the military site and the existing buildings, it would be helpful to describe and characterise the site in terms of it being representative of an evolving military base and understanding of its rarity compared to others surviving in the country. This would involve recording of the base and in clear character zones with attendant clear photographs which describe the site. It would be very helpful if the original buildings drawings (or a selection) can be secured for a public archive, and a photographic record made of the site, exteriors and interiors (if of interest). A site narrative would also be helpful, perhaps discussing the American architectural influence on this base. We will recommend that a condition be attached to any approval of the scheme in order to secure appropriate recording.

The historical layout of the site does not appear to be reflected in the current design proposals and we recommend that the scheme take all opportunities, such as street naming, to reflect the history of the site.

Yours sincerely

Stephen Walford  
Senior Manager – Place Service

**Appendix 1: School Site Specifications**

1. The site should be located in the heart of the community on a single site encouraging walking or other environmentally friendly means of pupils going to and from school (e.g. providing access to public transport and safe routes to school – i.e. pupils do not have to cross a major road). Proximity to other local community facilities (which pupils can visit as part of their learning and development) and associated parking areas (separate from staff car parking) are vital. The local authority is keen to encourage the co-location of other services (e.g. children centres, libraries, community centres, health centres, childcare facilities, adult learning, learning support units, places of worship, leisure facilities etc.). However, community use facilities on the school site (where use is intended during the school day) need to have a separate access and adult and pupil facilities should not be shared.

2. School security is important. For example, a school in a remote area is more vulnerable because it is not overlooked by neighbours.
3. Ensure the size of the overall site is dependent on number/age range of pupils given for each individual school (in line with the latest size guidance from the DfE) and any additional specially resourced or community facilities required. The site should also be capable of temporary expansion to accommodate any peaks in pupil numbers<sup>1</sup>.
4. Boundaries to be of regular shape, particularly around playing field areas otherwise a larger site will need to be provided.
5. Satisfactory road frontage to be provided compatible with the requirement for good “sight lines” to road access. Careful consideration should be given when designing the main entrances to the school and the likely congestion at peak times - in particular the safe pick up and drop off of pupils. Any set down-pick up parking area, which may be required as part of the brief, is not included in the school site area. There should be separate access points for (i) pedestrians, (ii) vehicular movements and (iii) grounds maintenance vehicles which do not pass over playgrounds or the building footprint.
6. Contours and undulations on the site will vary according to the topography of the area. A level site is recommended in order to minimise any requirement for earth shaping in order to accommodate buildings and playing fields. The fall of the playing field should be between 1:70 and 1:100.
7. Services and an unobstructed access road for construction purposes are to be available to the site boundary for the building start date.
8. sub-soil to be suitable for the design of the building (usually single storey for primary schools).
9. The developer to be responsible for removing any encumbrances such as buildings, soil stockpiles, hedges and overhead lines prior to the building start on site date. Sites should be largely free from building constraints such as pipelines, brooks, pylons, sewers, trees with preservation orders, landfill sites or rights of way. Developers shall be responsible for securing any surveys, such as archaeological and site contamination investigations, as necessary.
10. Sites should not be liable to flooding. A storm water outlet is required.
11. Sites should not be adversely affected by noise (e.g. traffic from major roads).

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<sup>1</sup> A survey carried out in Milton Keynes showed that in the short to medium term, with any major housing development, pupil numbers initially are slow to build up but then accelerate before falling to a settled number.

WDC's Arboricultural Officer:

Considers that there are a large number of high quality trees on the site which should be retained within any proposed development. Of the total 1080 trees recorded on site, 468 trees are to be removed to enable this development, 179 of these are considered to be of such high quality that their loss is considered unacceptable in arboricultural terms and this loss is therefore objected to.

The Local Planning Authority has a statutory duty to ensure that adequate provision is made for the preservation or planting of trees when granting planning permission for any development, in accordance with this duty the majority of the trees on the site have been protected with a Tree Preservation Order. The development brief requires that acceptable reasons for any proposed felling or other tree works are demonstrated to the Council. The examples of acceptable reasons given by the brief are not applicable to the loss of most of the trees.

It is considered that the British Standard (BS5837:2012) which sets out the standard way in which trees are dealt with in relation to developments, has not been followed correctly in terms of the appropriate categorisation of trees as constraints, or the way in which those constraints are considered in the design process.

The level of tree removal required by the proposal is so great that it is in conflict with WDCs Planning Policies G3, G10, G11, L6, CS17, CS19 and also the principles set out in NPPF paragraphs 56, 58 & 118.

In addition to the in-principle objection related to the layout, the current proposals are insufficiently detailed to ensure the loss of trees additional to those shown, would not occur, and the necessary detail has not been submitted to ensure new tree planting would be adequate or successful.

Additional tree retention (of in the region of 21 trees) can be accommodated within the current layout with minimal amendments to the details. (The Arboricultural Officer has also provided details of this).

**Comments:**

**All plans:**

The plans and details need to be updated so that they are:

- Consistent
- Accurate
- Feasible

They also need to show the information in a clear format which is easily interoperable, and they need to have keys which are of sufficient detail to explain what is on the plan. Details should be submitted prior to the final decision being made on the application to ensure that tree retention and new tree planting is successful.

**Cord Detail L, M & V 4996/ASPCD1-3**

The depth of the Surface Water Sewer/Manhole are unclear (3/4m?).

On **4996/ASPCD2**: the route the Surface Water Sewer/Manhole takes, runs through the location where trees are to be planted, this may inhibit the ability to install silva-cell or similar. The Foul water sewer might also be an issue.

On **4996/ASPCD3**: it should not be necessary for Surface Water Sewer to cross the central area where a tree should go in front of house 190.

This plan shows tree 734 retained, this is something I support (see later comments) however the Surface Water Sewer would encroach into the RPA of this tree, this will need to be amended so that it does not.

Tree Strategy Plan: **4996/ASP\_TS 01/A1**

**Comment of the lack of information submitted:**

Details are needed of tree planting specification. Where this is in areas with hard surfaces on top of the rooting area there will need to be structures containing un-compacted soil under the surface. The appropriate volume depends on tree size but should be in the region of 30m<sup>3</sup>. No details of silva-cell or equivalent have been submitted. At present, the ability to create satisfactory un-compacted soil volume for planting is in conflict with the positioning of drainage and sewerage, as drainage may be dictated by the ability to create adequate fall on pipe work it is unknown whether it would be possible to change these details to accommodate the requirements for the tree planting.

Therefore, it is necessary to show details of the underground structures which contain the un-compacted soil in which trees are planted on plans and in cross section where appropriate. Details will need to be provided on how these will be constructed, what soil will be provided within them, the access these spaces will have to surface water and provision for movement of air and filtration of water to remove pollutants, details will also need to be provided on how water logging will be avoided through drainage at a particular level (It would be appropriate for these areas to be incorporated in to a SUDS system).

A compromised position with the tree planting will mean that the compensation for the very substantial tree loss will be ineffective in the short and long term. Therefore without resolution of this, the overall harm caused by the proposals will be much greater in arboricultural terms.

**Comment of the information submitted:**

Although the creation of colour coded groupings is a step in the right direction it is (in most cases) insufficiently detailed to assess the appropriateness of the species to the location. Additional detail is therefore required:

1. For: 'Woodland Boundary Planting', 'Western Boundary', 'Eastern Boundary', 'Industrial Estate Planting\*', 'Rear Garden', 'Open Space Trees', percentage mixes need to be shown. (In all other locations it is necessary to show exactly what tree species will be planted in each location.
2. For: 'Street Trees' and the 3 cord types (L, V & M). The species which are to be allocated for individual locations needs to be shown.
3. The approach to the woodland boundary should address concerns about the future risk, over dominance of the trees on the woodland edge and wildlife value of woodland edge. In summary:
  - a. Large trees species should not be planted on the woodland edge. Instead this must be smaller woodland edge species such as Field maple (*Acer campestre*), Hazel (*Corylus avellana*), Blackthorn (*Prunus spinosa*), Hawthorn (*Crataegus monogyna*), Damson (*Prunus domestica*), Crab Apple (*Malus sylvestris*), Yew (*Taxus baccata*) & Holly (*Ilex aquafolium*).
  - b. Planting of native woodland shrub species such as Spindle (*Euronymus*

*europaeus*), Wayfaring tree (*Viburnum Lantana*) and Dogwood (*Cornus sanguinea*) would be appropriate as whips amongst the other trees.

- c. Where the 'Rear Garden' selection of species applies to the edge of the woodland there needn't be so many trees and there shouldn't be non-native species (*Cercis siliquastrum*).
4. The plans also show proposals in specific areas which are inappropriate:
- a. Cord V includes *Liriodendron tulipifera* and *Betulus pendulus* 'Tristis', these two species are of very different shapes and size and do not go together well. *Betulus pendulus* 'Tristis' needs to be replaced with a species which is more similar in stature to *Liriodendron tulipifera* for example Turkish Hazel (*Corylus colurna*). If *Betulus pendulus* 'Tristis' was included in this mix so that it could be included in the tight court yard location, this location might be better filled with a fastigiated tree, perhaps feathered *Prunus Amanogawa*.
  - b. Cord M only includes a single species *Carpinus betulus* 'Frans fontaine', although this might be appropriate in many locations it is not appropriate to be the sole tree planting on the south west side of the road alongside the area reserved for sports pitches. The bank between the road and the pitches will need more planting, a mix similar to that proposed for the 'Eastern boundary' would be appropriate.
  - c. Cord L only includes two species, as trees with this colour are shown planted in a wide range of different situations which would present opportunities for more variety of species.
5. Locations which previously showed trees on DAWS – MO1 rev A now show a reduction in tree numbers:
- a. The islands adjacent to the round about where the estate roads are, previously had trees.
  - b. Cord M closest to the industrial estate previously had more trees.
6. In addition to the above locations where more trees are required, additional trees are required:
- a. along the main road which runs through the site which emanates from the West side of the roundabout.
  - b. on the green spaces between parking spaces in the industrial estate
7. On the verge just to the west of the roundabout there are a large number of Beech trees shown to be planted. It would be appropriate to include a couple of

English Oaks and a Copper beech in this mix of trees.

(\*Is there still to be a bund around the industrial estate? It is not clear on plans I have seen.)

### **Tree Protection Plan (1/6) 8494 TPP 01 Overall (Revision J)**

The Tree Protection Plan (TPP) has been submitted as a single A1 sheet. This would be more easily examined if there were several large scale plans. (The title suggests there could be 6 large scale plans for this.)

There is no need for the following to be show on this plan as they make the important detail almost impossible to read:

- Shading
- Group categories
- Trees to be removed

### **Demolition/Construction adjacent to trees**

The RPAs shown do not extend under roads or other built structures on the plan. This is likely to be the case in many instances but not in all. Care will need to be taken where hard surfaces are to be removed in close proximity to trees, where this is within 12x the stem diameter at 1.2m above ground level, there will need to be a specification to be drawn up to be followed, this will in most cases also require arboricultural supervision. No details have been submitted detailing how the built structures will be removed in proximity to trees and as this will be very sensitive, there are no assurances that trees will be adequately protected.

In many instances there are built structures currently within what would normally be considered the RPAs of retained trees. The way in which Aspect has dealt with this means that all built structures are thought of as a barrier to rooting, this is unlikely to be the case in many circumstance as many of the built structures will not be a significant constraint to rooting, e.g. some of the pre-fab buildings within the proposed open space area are likely to only have shallow concrete raft foundations which roots may grow under. This fact needs to be recognised in detailed Method Statement which will be required to prove how demolition and removal of structures will be accomplished without causing damage to trees. An arboricultural consultant and a construction/demolition professional will need to be involved in the production of the details in the Method Statement.

### **Swales**

The position of swales is not permissible within RPAs of retained trees. This plan does not show the up to date position of swales, it needs to be updated to reflect updated proposals. The updated position of swales on plans 25263/010/009 and 25263/010/026 is outside of the RPAs but there are other problems with these plans (detailed in the section specific to the plans below), there is also a lack of information pertaining to the swale proposed adjacent to the woodland.

### **Paths**

The path shown within the woodland area to the north of the site will not possible within the constrained space between the proposed barrier fence. A practical solution to the construction of the path needs to be detailed.

The construction of the path using a combination of no-dig and standard techniques is not practical where the path goes in and out of RPAs, it is appropriate to use no-dig techniques all the way through in these circumstances. This is an obvious problem

amongst the trees in the central open space as well as other areas.

On the front boundary with Daws hill lane there appears to be two path lines adjacent to the removed tree 76. One line is shown as no-dig and another is just shown as a plane line. This is an obvious mistake which needs correcting.

#### **Other no-dig**

In areas where surfacing (roads, parking bays or footpaths) is to be constructed within the RPA of trees, 'above soil surfacing' is shown on the plan. Although the theoretical method for this has been outlined in the Arboricultural Impact Assessment (8494\_AIA001.rev\_G July 2013) there needs to be far more detail for how this would be achieved as the current proposals could not be accomplished due to necessary changes in levels and this cannot be dealt with by condition (Paragraph 1.3.4 of the AIA is not agreed with, any comments I made relating to the use of conditions for AMS were made with the assumption that the scheme would be redesigned to accommodate important tree constraints, this has not happened).

#### **Poor quality details**

The plan incorrectly shows trees which have a thin red surround as trees which have a 'U' category. This is incorrect, these trees have a variety of categories, the common feature is that they are to be removed to enable this development proposal.

The plan shows the trees with red dashed lines around them, on the key this is shown as 'Trees to be Removed' in reality this is more likely to be the trees which have been categorised as 'U' category trees.

Due to the excess of unnecessary information it is difficult to see where 'Manual Excavation' is proposed. It appears that the internal road adjacent to the trees just north of the roundabout would involve manual excavation. This needs to be detailed as there should be no need for any excavation if the road is appropriately built using no-dig design.

#### **Specialist Foundations**

It is proposed (below) that more trees can be retained without substantial changes to the layout. However, there would be a requirement to carry out some of the construction using special foundation techniques such as pile and above ground beam. Details of this must be submitted which take into account retained soil levels within Root Protection Areas. In addition there may be a requirement for access facilitation pruning.

All details need to be up-dated to accommodate all trees which it is suggested could be retained (see below).

#### **Proposed Site Access, Proposed Levels Plan - 25263/010/009**

The plan is unclear and visually cluttered:

- Each retained tree has a red a black and a grey line around it, why are there all these lines?
- The trees which are to be removed do not need to be shown.
- There are lines on this plan which are not obvious and not explained by the key.

#### **Open Space Plan Proposed Swale Levels - 25263/010/026**

This plan shows lots of trees many of them are phantom trees. They have been plotted in the wrong place. The plan cannot be relied upon at all with regards to trees!

As far as other issues, e.g. the swales, these has been moved out of the RPAs of trees but it looks like water would need to flow up hill to get to them! More detail will be needed

in relation to the swales.

### **Comments on previously submitted documents**

#### **Comments on the Arboricultural Impact Assessment 8494\_AIA001.rev\_G July 2013**

There are many details in this document which are incorrect, these include judgements made, opinions put forward, interpretation of the British Standard (BS5837:2012) and reports of what it is claimed I agreed to.

The grading of trees is not as per the standard and this document is not an adequate basis for the consideration of the trees on the site. Despite repeated comments about the inadequacy of the categorisation of trees and the way trees have not been considered as a constraint. No attempt has been made to adjust the proposals or the details about arboricultural constraints which they should take into account.

WDC Natural Environment Officer:

## Landscape and Ecological Comments on revised plans:

Landscape strategy (comments to be read in conjunction with the Arboricultural Officer's comments):

- The revised masterplan seems in some ways a step backwards. Whilst tree planting has increased in some selected locations, e.g. cords L & V, in other areas tree coverage seems to have decreased. The plan shows fewer retained trees (e.g. existing trees in gardens 400 & 401 are no longer shown to be retained) and fewer tree planting in selected locations (e.g. fewer trees in the central reservations of cord M).
- The Landscape Masterplan has not been revised to reflect our discussions, e.g. tree and shrub planting along the northern boundary of the pitch, different style of planting at the industrial estate, no tree planting in the woodland buffer strip etc; proposed ecological enhancement are also not reflected;
- The Tree Strategy Plan remains largely unspecific about what tree will be planted where but gives a range. That's fine for some situations (e.g. planting within the open space or the buffer planting around the industrial estate) but percentages on the mixes are required. In addition, in some key locations (e.g. prominent locations in the street environment) it would be important to know the exact tree species proposed.
- Whilst I largely agree with the tree species proposed there are still some species that in my view are used in the wrong location and at the wrong frequency, e.g. *Betula tristis* (weeping birch) in combination with *Liriodendron tulipifera* (tulip tree) in cords V.
- Ecological mitigation and enhancement measures are not fully reflected in the landscape strategy. Previous ecological comments on mitigation still apply.

More detail on tree species in Arboricultural Officers comments.

### Buffer to woodland edge

The ecological buffer includes changes in level to create swales and embankments for surface water drainage. The revised information does not include any information on these but such operations could potentially adversely impact on the trees along the woodland edge. The introduction of bunds and swales might also compromise the creation of a structurally diverse woodland edge treatment as it would usually be expected.

The creation of swales for surface water drainage would only be acceptable in this location if:

- The creation of the swales does neither require excavation nor building-up of levels within the root protection zone to a degree that would compromise the survival and health of the trees;
- Any surface water is cleaned appropriately (e.g. oil interceptor etc) before being discharged into the swales to avoid contamination of the nearby woodland habitat;
- The buffer strip is not planted up with large-growing native trees but comprises hazel scrub of hawthorn, blackthorn, fieldmaple and hazel as this will a) create a structurally-diverse woodland edge, b) help manage the tree risk, c) create an ecologically valuable habitat and d) potentially discourage residents from extending their gardens or littering. This is not the type of planting currently proposed on the landscape strategy plan.

The treatment of the buffer strip is not acceptable as shown. More information required.

### Central open space

- Submitted 1:200 plans are enlarged versions of the topographical survey with most of the proposed layout imposed. The plans are difficult to read and do not contain landscape details as required and requested. There is no comprehensive landscape plan for the open space;
- The plans show the extent of the swale and a spot height but no other detail such as profile, make-up, planting etc. It is therefore unclear how the swale area will be perceived visually and whether it will be usable in open space terms.

- Information on management and open space responsibilities, i.e. which areas are proposed to be transferred to the Council for management, is still outstanding.

The hard and soft landscape treatment of this area requires further detail and thought.

#### Buffer planting near industrial estate (also see Arb comments)

- Tree planting in the buffer strips is too dense in places. The planting should comprise a native shrub mix similar to the one proposed (with less *Ribes* but more other native species – see Council’s native hedgerow advice note) and fewer trees or groups of trees planted between the shrubs;
- Proposed tree mix for this area is rather strange (too many large trees and too many different types of conifer) and requires revising;
- I also seem to recall from one of the meetings that the boundary between the industrial estate and the residential areas comprises changes in level which will result in a bund between the areas. No details to this respect have been submitted but are required to ensure that the boundary treatment is feasible and appropriate;
- The planting will require appropriate management.

The proposal is not acceptable as shown and needs revising. More information required.

#### Landscape treatment of cords (comments to be read in conjunction with the urban design officer’s comments)

Revised drawings for Cords L, M and V have been submitted. I second the urban designer’s comments that the design of these does not have moved forward significantly with the service strips and visibility requirements still dominating the design somewhat, truncating the front gardens and emphasising the entrances to parking areas and with two of the three styles reducing further the extent of planting. The inclusion of bollards on one of the styles is also a backward step.

No corresponding planting plans have been submitted. If previous landscape treatments as outlined in the landscape design statement are anything to go by proposed planting includes a high amount of low growing species and grasses that will have insufficient impact and are vulnerable to damage.

For these areas to work, the trees need to be substantial and the planting areas/ plants themselves significant, i.e. higher growing shrubs and hedges; otherwise the extent of hard surfacing will dominate.

In addition, insufficient information is provided on the make-up and potential appearance of some of the features in the central reservation such as the soakaways and the Hydro Filterra, the purpose of the latter is not clear.

Choice of trees and method of tree planting requires further consideration – trees should be planted in a trench in appropriate substrate (see Arboricultural Officer’s comments).

Boundary treatments to front gardens have been introduced in cords L and M, but cords V lacks boundary defining features. The introduction of low boundary hedging is recommended.

#### Boundary treatments

- Close-board fencing backing onto the woodland will require the posts to be concreted in as proposed as one of the mitigation measures of the ecological assessment.
- The existing post & wire boundary fence shall be removed and the site boundary be marked with Feno stud markers

### Impact on the LWS:

The proposed development will result in an increase of approximately 1000 residents compared to the previous residential use of the site. In addition, the site is currently fenced limiting its connectivity with the LWS.

The greater connectivity of the site and the increased number of people will in my view put additional pressure on the woodland in form of activity, noise, lighting, damage of plants, disturbance, litter, dumping of garden waste, potential land take etc, which might adversely impact on the habitat and faunal species. The retention of a 15m wide buffer strip between the development boundary and the woodland is welcomed and will work towards mitigating impacts on the woodland habitat but some impacts are likely to remain.

Indirect impacts of this nature are both difficult to assess and to mitigate but I would like to see further mitigation measures included such as:

- Providing residents with information on the ecological interest of the woodland. This should include information on how residents can support wildlife in their own gardens (as already suggested by the applicant) but also which actions could be harmful and should be avoided (e.g. tipping of garden waste);
- A financial contribution towards the management of Keep Hill Wood to deal with the increased pressure should be sought. A draft cost proposal from the Chiltern Rangers, who manage Keep Hill wood for the Council, is currently being prepared.

### Correlation between drawings

Revised plans try to address specific issues, however these changes are not carried through onto any other drawings. Consistency between the drawings is required

### **Conditions:**

A number of landscape and ecological conditions will be required should the development be approved.

## Landscape and Ecological Comments on original plans:

### **Ecological Comments:**

A review of the existing ecological information, a desktop survey, a Phase 1 Habitat Survey, a protected species appraisal and species surveys with regard to bats and badgers have been carried out.

The badger survey found two disused setts at the northern boundary of the site and two used setts in the woodland some distance from the site boundary.

The bat activity survey found relatively little foraging activity of bats within the site with main activity taking place along the woodland edge and along the treed bridleway, which crosses the site in north-southerly direction.

The bat emergence survey established 6 confirmed and 2 potential non-breeding bat roosts within buildings, all of which appear to be transitory roosts of a low numbers of bats. Trees on site have been assessed for their potential of supporting bat roosts, with a limited number being assessed as having moderate roosting potential for bats.

The ecological assessment considers the development not to have an adverse impact on any protected habitats or protected species. It also concludes to have a negligible impact on designated sites including the LWS (Local Wildlife Site) Keep Hill Wood. The impact on the Ancient Woodland designation has not been assessed but the residential boundaries have been set back by 15m to create a buffer as required by Natural England's standing advice on Ancient Woodland.

The assessment further concludes that the scheme will adequately compensate for any habitat loss including the loss of a third of the trees on site and will over time have a beneficial ecological effect.

I largely agree with the findings with regard to protected species and habitats but consider the ecological impact caused by the loss of mature trees and the impact on the LWS to be greater than stated.

### Tree loss:

Existing mature trees are important habitats in their own right as well as forming important green infrastructure links. I do not agree that the proposed tree planting will fully mitigate the tree loss caused by the development. Although tree planting is very welcomed it will take new trees a long time to mature and to deliver similar ecological benefits as the existing mature trees. Ecological benefits also depend on the choice of species, the provision of adequate space and the correct management. Although the proposals include some good species choices they still include a relatively large number of lower-growing ornamental species, which will not have the same impact as mature native trees.

If the tree loss is accepted it is important that trees and shrub species are chosen that support wildlife, i.e. flowering and fruit-bearing species as well as large-growing native species. Generally a mixture of trees should be chosen with native species being used in locations near the edges of the site (e.g. near the woodland), and where there is sufficient space within the development. Shrub planting should adopt a similar approach.

The tree selection put forward as part of the development does to some degree already reflect this approach but could be improved (see comments on tree choice).

### Impact on the LWS:

The proposed development will result in an increase of approximately 1000 residents compared to the previous residential use of the site. In addition, the site is currently fenced limiting its connectivity with the LWS.

The greater connectivity of the site and the increased number of people will in my view put additional pressure on the woodland in form of activity, noise, lighting, damage of plants, disturbance, litter, dumping

of garden waste, potential land take etc, which might adversely impact on the habitat and faunal species. The retention of a 15m wide buffer strip between the development boundary and the woodland is welcomed and will work towards mitigating impacts on the woodland habitat but some impacts are likely to remain.

Indirect impacts of this nature are both difficult to assess and to mitigate but I would like to see further mitigation measures included such as:

- Providing residents with information on the ecological interest of the woodland. This should include information on how residents can support wildlife in their own gardens (as already suggested by the applicant) but also which actions could be harmful and should be avoided (e.g. tipping of garden waste);
- A financial contribution towards the management of Keep Hill Wood to deal with the increased pressure should be sought. Proposals would still need to be drawn up but moneys could be used for woodland management such as tree planting, information boards, guided ecology walks, eco leaflets, measures to subtly restrict access to specific areas or similar.

#### Ecological buffer

The ecological buffer includes changes in level to create swales and embankments for surface water drainage. Little information has been provided with regard to these but such operations could potentially adversely impact on the trees along the woodland edge. The introduction of bunds and swales might also compromise the creation of a structurally diverse woodland edge treatment as it would usually be expected.

The creation of swales for surface water drainage would only be acceptable in this location if:

- The creation of the swales does neither require excavation nor building-up of levels within the root protection zone to a degree that would compromise the survival and health of the trees;
- Any surface water is cleaned appropriately (e.g. oil interceptor etc) before being discharged into the swales to avoid contamination of the nearby woodland habitat;
- The buffer is planted up with species that are typically used to create a structurally and ecologically diverse woodland edge treatment, i.e. native shrubs with a small number of trees. This is partly being done but the species mix and the proportion of tree to shrub planting could be improved.

The ecological assessment states that the existing fence will be retained in situ. If this is the case it would create a strip of no man's land between two fence lines which will look strange and might compromise the movement of species. The removal of the existing fence is in my view more appropriate.

#### Mitigation

The ecological assessment proposes a range of measures to mitigate ecological impacts within the site and to provide ecological enhancements. I agree with the measures proposed but these are not fully reflected in the architect's and landscape architect's proposals.

- bat lofts and tubes - these need to be integrated in the built-fabric of houses which appears not to have happened;
- appropriate planting - this has partly been addressed but can be improved (see comments above);
- ecological buffer strip - integrated in the layout but care needs to be taken with regard to its implementation and treatment (see comments above, more information required);
- wildlife meadows - shown in selected locations but might not be feasible in all locations shown, e.g. underneath mature tree canopy;
- species selection with regard to trees and shrubs - done in parts but can be improved;
- bat boxes / bird boxes / log piles - don't appear on landscape drawings;
- Management - ecological benefits are dependent on the correct management. A management plan is required which should clearly define quality standards, management operations and management responsibilities.

#### **Landscape comments:**

## **Landscape & Visual Impact Assessment:**

The LVIA concludes that:

- Any impacts will be localised affecting the application site and the immediate surroundings only;
- Any adverse effects will primarily be temporary, i.e. during construction only;
- The development will have a beneficial impact on the landscape character and views once planting has matured (year 10)

The LVIA contains a lot of useful information but I do not fully agree with all the findings of the assessment. I would generally consider some of the effects more severe than stated.

### *Landscape Impact Assessment*

With regard to the landscape impact assessment I consider the assessment not to sufficiently capture the treed and low-density character of the site. The loss of a large number of mature trees together with a much denser development pattern will in my view change the character of the site. This change will be experienced at a local level and is expected to decrease over time with increasing maturity of vegetation.

### *Visual Impact Assessment*

With regard to the visual assessment I consider the visual effects to be greater than stated for some of the views. This is partly caused by the assessment stating a lesser magnitude of impact than expected. In views where both motorists and pedestrians are affected I consider the pedestrians to be more sensitive than the motorists, an aspect that has not been differentiated in the assessment.

Adverse visual effects are in my view not limited to the construction phase only but will be felt after completion. However, effects are expected to decrease over time with increasing maturity of the vegetation. Potential significant adverse visual effects might be experienced by residents abutting the site to the west, users of the central bridleway and users approaching the site from the woodland.

The development is likely to have some beneficial effects on some views (e.g. Daws Hill Lane) in the long term.

I am not convinced whether the impact on long-distance views from the other valley side has been accurately assessed. The report is not clear whether and/or to what degree the development would be visible. The wooded slope and the unspoilt skyline are an important landscape characteristic and a noticeable break in the skyline could be an issue in LVIA terms.

The wireframe visuals suggest that the development will not be visible however no information is given on how these were produced, which makes it difficult to judge their accuracy.

More information on the wireframe images should be sought to provide confidence in the findings.

### *Questions regarding the wireframe images*

- What method has been used to create these?
- Do the images show the built form just to the eaves or to the ridge? – this question arises particularly when looking at the longer distance views (Vp15, 17, 22, B)
- How have the levels been worked out, on which the wireframe should be placed?
- Vp7: is this indicative photomontage correct? It shows the conifers along Daws Hill Lane to be retained although these are recommended for removal. It also shows Daws Hill Lane as it is and not the proposed roundabout near the village centre, part of which is likely to be visible in this view.
- Vp 17 & 22: does this view show the impact with the trees on site removed? I.e. is the wooded skyline formed by the trees on site or by the woodland edge although latter is lower lying? The development includes the removal of a large number of trees – if the skyline represents trees on site which are going to be removed the development could potentially be much more visible. The visual assessment descriptions also suggest that the development might break the skyline when viewed from the opposite

side of the valley. However, elsewhere in the report it states that the development has been carefully designed to avoid this to happen.

### **Landscape Proposals:**

#### **Landscape design approach:**

The landscape proposals differ from the architects impressions.

Whilst I understand the landscape architects wish to respond to the different architectural styles by having responding landscape treatments, I am neither convinced that these will be understood on the ground nor that they will result in a high quality environment.

In some locations the proposed landscape treatments are not substantial enough, impractical and/or are of inappropriate style (e.g. cords type 'M') to create a high-quality environment.

#### **Landscape strategy:**

The LVIA makes references to a 'comprehensive landscape strategy' to reinforce the existing, retained treescape and to enhance the landscape framework.

The development aims to create a strong landscape structure by retaining blocks of mature trees and by creating meaningful soft landscape connectors between them. This approach is generally welcomed but has not been executed throughout.

Most of the boundary vegetation and some of the main tree groups are proposed for retention which is very welcomed. In addition, tree planting is proposed in most of the streets and some of the back gardens, all of which is welcomed. However, the development still comprises the loss of many good mature trees, which cannot be compensated for through new planting, much of which is ornamental and low-growing. New planting will take a long time to mature, and the denser housing layout and type of planting will not create the same sylvan character. The integration of more structural planting including larger-growing trees should be sought (see Arb officer's comments on tree choice).

#### **Correlation between plans:**

The landscape architects design approach (as outlined in the landscape design statement) does not reflect the visualisations put forward by the architect. Similarly the tree species on the planting plans do not tally with the one suggested in the landscape design approach;

**Tree planting in hard landscape areas:** trees should be planted in Silvacell or similar to ensure that trees have sufficient space for roots to grow and to reach maturity;

**Tree planting in soft landscape:** proposed tree detail is only acceptable in unconstrained soft landscape areas. See Arboricultural Officer's comments for more detail.

**Tree assessment:** the categorisation of trees and acceptability of this assessment is covered in the Arboricultural Officer's comments

#### **Buffer planting around the employment use**

Tree planting in the buffer strips is too dense in places. Native trees should be chosen and planted individually or in small groups between the shrub mixes. *Coryllus avellana* (Hazel) is not considered a tree but a shrub and should remain included in the shrub mix.

#### **Tree choice and shrub mixes**

See Arboricultural Officer's comments on tree choice. The woodland mix and the native shrub mix are very similar and should be more differentiated. Mixes should include less *Ribes spec* (currant) and other native species, e.g. as outlined in the Council's native hedgerow advice note.

### **Open space:**

The scheme provides open space slightly in excess of the open space requirements. The creation of a central 6 acre park with a neighbourhood play area between mature trees is welcomed. It is a great asset to the scheme and will significantly contribute to the scheme's open space needs. More information is required on the design and make-up of this space to ensure that the proposed swales don't compromise the usability of this park. The impact of any design elements such as the play areas on trees also needs to be considered.

Other smaller open spaces exist throughout the scheme, which tend to be characterised by mature trees. These spaces are important structural elements within the scheme and are welcomed in landscape and visual terms. Mature trees will however restrict the use of the space.

The scheme also provides a playing field which is welcomed. It is my understanding from speaking to the Council's community services that they do not consider the pitch usable on the location shown due to its close proximity to housing. One pitch does also not provide the critical mass of pitches required to make any management feasible.

From an open space planning point of view the provision of the pitch is welcomed. Even though it might not yet provide the critical mass of pitches required, it offers a flexible approach for the future if and when the adjacent Abbey Barn South site is developed. In the meantime the space can be used informally and flexibly providing the development with an informal sports pitch.

## **Conclusion:**

### Ecology

The development is unlikely to cause significant ecological effects. Of greatest concern are the loss of habitat in form of mature trees and increased pressure on the LWS caused by the larger number of people. Mitigation measures are proposed but will need to be fully integrated into the landscape design.

### Landscape

The development is expected to cause landscape and visual effects but these are mostly localised and expected to decrease over time. An exception to this is the potential impact on long-distance views from the North, the impact on which is not clear. Clarification should be sought.

The landscape strategy seeks to create a strong landscape framework by retaining areas of mature boundary vegetation and by creating green links between these areas. Whilst this approach is generally welcomed the proposed tree and shrub planting is not considered strong enough throughout the scheme to achieve this. Improvements to the landscape treatment in form of more appropriate tree and shrub planting should be made.

### Open space

The open space provision slightly exceeds open space requirements in quantity. It is considered to provide well for informal open space uses and play, and offers a flexible approach to pitch provision. Allotments are not provided as requested due to the large amount of mature trees constraining large parts of the site.

## **Conditions:**

A number of landscape and ecological conditions will be required should the development be approved.



The application site is set in a residential area and is therefore very sensitive in terms of noise and dust produced by demolition and construction activities. Such works will be regulated by the relevant sections of the Control of Pollution Act 1974 & the Environmental Pollution Act 1990. The applicant has also pledged to submit a Code of Construction Practice prior to any works.

Finally, a small part of the application site is located within an Air Quality Management Area (AQMA). This AQMA was declared due to the poor air quality associated with road traffic using the M40 motorway. Whilst this application proposes development within an AQMA it must be noted that this development will be comprised of B1c & B8 industrial units (and not residential) that will not significantly contribute to the pre-existing poor air quality which, as already stated, is solely due to motorway traffic.

### **3. Recommendation (with conditions if appropriate):**

- **Hours of use - B1c/B8 Industrial Units**

*No machinery shall be operated, no process shall be carried out and no deliveries taken at or despatched from the B1c/B8 industrial units outside the following times - 07:00 to 22:00 Mondays to Saturdays, 08:00 to 13:00 on Saturdays and not at all on Sundays, Bank or Public Holidays.*

*Reason - To protect the amenities of nearby residents*

- **Sound Insulation – B1c/B8 Industrial Units**

*The use shall not commence until a scheme for insulating the B1c/B8 industrial units, including any external plant areas, has been submitted to and approved in writing by the LPA. Thereafter, the B1c/B8 industrial units shall not be used until the approved scheme has been fully implemented*

*Reason - To protect the amenities of nearby residents*

- **Control of Noise – Pumping Station**

*A scheme shall be submitted to and approved in writing by the Local Planning Authority before any development takes place which specifies the provisions to be made for the control of noise emanating from the proposed pumping station. Thereafter, the use shall not commence until the approved scheme has been fully implemented.*

*Reason - To protect the amenities of nearby residents*

- **Opening Hours – A1 Retail Unit**

*The opening hours of the A1 retail unit shall be restricted to the hours of 07:00 to 22:00.*

*Reason - To protect the amenities of nearby residents*

- **Hours of Deliveries – A1 Retail Unit**

*No deliveries shall be taken or despatched from the site outside the hours of 07:00 to 19:00 Monday to Saturday and 07:00 to 17:00 on Sundays, Bank or Public Holidays. Any deliveries made before 11:00 on Sundays, Bank or Public Holidays shall only be made by vehicles not exceeding 7.5 tonnes.*

*Reason - To protect the amenities of nearby residents*

- **External Plant – A1 Retail Unit**

*A scheme shall be submitted to and approved in writing by the Local Planning Authority before any development takes place which specifies the provisions to be made for the control of noise emanating from areas of external plant associated with the A1 retail unit. Thereafter, the use shall not commence until the approved scheme has been fully implemented.*

*Reason - To protect the amenities of nearby residents*

- **Opening Hours – D1 & D2 Units**

*The opening hours of the D1 and D2 units shall be restricted to the hours of 07:00 to 23:00.*

*Reason - To protect the amenities of nearby residents*

- **Sound Insulation – Motorway Traffic Noise**

*A scheme to protect the proposed development from traffic noise from the M40 motorway shall be implemented before any part of the accommodation hereby approved is occupied, unless the Local Planning Authority otherwise agrees in writing. The scheme shall ensure the indoor ambient noise levels in living rooms and bedrooms meet the good standard in BS 8233:1999 of 30dB LAeq for the appropriate time period. Unless otherwise agreed in writing with the Local Planning Authority it shall be assumed that the existing noise level at the façade of the proposed development is 72dB LAeq16 hour and 66dB LAeq, 8 hour. The scheme shall include mechanical ventilation to meet the requirements of the Noise Insulation (Amended) Regulations 1988.*

*Reason – To protect the occupants of the new development from noise disturbance*

- **Contaminated Land**

*The following shall be submitted to and approved in writing by the Local Planning Authority before any development takes place:*

*a) A detailed site investigation has been carried out to establish:-*

*i) If the site is contaminated;*

*ii) To assess the degree and nature of the contamination present;*

*iii) To determine the potential risks to human health, the water environment, the natural and historical environment, and buildings and other property by contaminants.*

*Such detailed site investigation to accord with a statement of method and extent which shall previously have been agreed in writing by the Local Planning Authority and*

*b) The results and conclusions of the detailed site investigations referred to in (a) above have been submitted to and the conclusions approved in writing by the Local Planning Authority and*

*c) A scheme showing appropriate measures to prevent the pollution of the water environment, to safeguard the health of intended site users, and to ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation and approved conclusions has been submitted to and approved in writing by the Local Planning Authority.*

*Thereafter the development shall not be implemented otherwise than in accordance with the scheme referred to in (c) above.*

*Reason - To ensure that the potential contamination of this site is properly investigated and its implication for the development approved fully taken into account*

- **Lighting Scheme**

*No floodlighting, streetlighting or other form of external lighting shall be installed unless it is in accordance with details which have previously been submitted to and approved in writing by the Local Planning Authority. Such details shall include location, height, type and direction of light sources and intensity of illumination. Any lighting which is so installed shall not thereafter be altered without the prior consent in writing of the Local Planning Authority other than for routine maintenance which does not change its details.*

*Reason - To protect the amenities of nearby residents*

- **Standard Informative I17 - Construction/Demolition Noise**

## Other Wycombe District Council Services:

### Comments from Community Services

The S106 will need to require completion of the community building to 'turn key' condition i.e. in a state whereby it can be used immediately for community activities. Also for the community hall to be acceptable there is a need to provide additional toilets as the number currently in the plans do not appear sufficient for a multi-function hall.

### Comments re flood risk and drainage: no objections

### Comments from Environmental Co-Ordinator

The Energy Strategy for the above has been developed to comply with current DSA policy DM18 through the provision of PV panels on suitably orientated roofs. These are stated to contribute more than 15% to carbon reduction. From figure 3.2 it seems that few will be on the street facing slope. If for any reason, the number of panels has to be reduced for design reasons, care should be taken that it does not bring the level of generation below the 15% reduction requirement. If this should be necessary, it should be required to replace the technology with either another form of microgeneration, or increase the energy efficiency of those dwellings. It is noted that heat pumps including air source heat pumps could have a potential contribution of 10 to 40% which is a far greater contribution than that of PVs which are limited by the orientation of the buildings and possibly shading by trees.

An assessment of the impact of trees on light levels does not seem to have been made although the usefulness of the trees for providing shade around the perimeter in particular has been included. Given that a number of trees are being retained is it possible to receive some assurance that this has been addressed? Having looked at the Tree Protection plan I am not sure that there will not be some panels that may be shaded.

I note that the consultants caution that energy statements for the development should be submitted in stages to take viability into account. They raise the issue that the political context is changing in respect of local standards and that in probably two years' time; we may not be able to require renewable technology.

**RAF Daws Hill, Daws Hill Lane, High Wycombe, HP11 1PZ - Application by Taylor Wimpey West London**

Thank you for your consultation memo dated 22/07/13 regarding the above matter.

I note that the information submitted by the applicant indicates the affordable homes to be 37 dwellings for shared equity and 71 for rent. Of the 71 homes for rent; 17 are shown as 2 bed apartments, 16 as 2 bed houses, 22 as 3 bed houses and 16 as 4 bed houses.

Whilst supportive of the inclusion of affordable housing within the scheme, I do have some issues with the proposed dwelling mix of the affordable homes for rent, as outlined below:

- a) There aren't any 1 bedroom affordable homes for rent – although 20% is requested in the Development Brief;
- b) There is an over-provision of 4 bedroomed houses (16) for rent in comparison to the percentage requested in the Development Brief;
- c) The application sets out that the majority of 3 bedroomed houses have 6 bed-spaces and the 4 bedroomed houses have 7 bed-spaces. It appears from the plans that the housing service could only advertise these houses for let as 3 bed 5 person and 4 bed 6 person homes respectively.

There is a significant need for 1 bed accommodation for rent and the impacts of Welfare Reform are resulting in there being fewer households in housing need who have the ability to afford larger family dwellings with 4 bedrooms or more.

I shall therefore be grateful if some revision of the mix of the affordable rented homes can be considered - by reviewing the provision of 16 x 4 bed houses and:

- i) Keeping 6 of them as 4 bed houses, preferably not all together in one row;
- ii) Converting 5 of them into 3 bed houses (if it is possible to remove the partition wall to the second floor, could there be scope to create one large bedroom on that floor?);
- iii) 'Exchanging' the other 5 x 4 bed houses for an equivalent number of bed-spaces to be provided in the form of 1 bed / 2 person homes.

There is a need for affordable housing in the area and in principle I am in support. I do however have some reservations as outlined above and shall be grateful if some potential alternatives can be investigated.



Brian Daly  
Housing Service Manager

Wycombe District Council  
Planning & Building Control  
Council Offices  
Queen Victoria Road  
High Wycombe  
Buckinghamshire  
HP11 1BB

**Our ref:** WA/2013/115454/04-L01  
**Your ref:** 13/05799/FULEA  
**Date:** 17 October 2013

Dear Mr White

**A hybrid planning application seeking detailed planning permission for the demolition of the existing buildings and mixed use development to provide 433 dwellings (364 houses and 69 apartments) 448.13m<sup>2</sup> retail unit (class a1), 536.05m<sup>2</sup> community centre (class d1), 211.55m<sup>2</sup> air training corps building (class d2), 9 industrial units (2819.29m<sup>2</sup> class b1c/b8), bus hub, school drop-off, open space, play areas, landscaping, car parking, the creation of a new access from Daws Hill Lane, retention of the existing access from Daws Hill Lane. Outline planning application for a primary school and pre-school (up to 1350m<sup>2</sup> class D1) with all matters other than access reserved. RAF Daws Hill, Daws Hill Lane, High Wycombe, Buckinghamshire, HP11 1PZ .**

I refer to your email dated 18 September 2013 and the email dated 05 September 2013 from Thames Water. We have the following comments to make.

Thames Water has stated that there is sufficient capacity within the works (both current and forecast) for this development at a theoretical level in their email dated 05 September 2013.

In light of the above we are able to **withdraw our objection** to the proposed development on foul drainage grounds subject to the following conditions:

**Condition:** Development shall not begin until a detailed surface water drainage scheme for the site, based on Chapter 15 of the Environmental Statement and its attached Appendices, and including the Flood Risk Assessment (document ref 25263/010/FRA) and drawing 25263/010/SK02 has been submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details.

The scheme shall include:

- Confirmation of the volumes required for attenuation (currently 7,100m<sup>3</sup>) and where these will be onsite, including the connectivity, if required, to the 1 in 100 plus an allowance for climate change;
- Infiltration tests in accordance with BRE365 for those locations where direct infiltration is proposed to demonstrate its continued feasibility (and where this is no longer feasible due to detailed design, demonstrate how these additional volumes will be catered for onsite);
- Revised calculations that exclude water butts as a means of attenuation (there is no guarantee that these will be empty at the time of the critical storm event)
- An understanding of how the existing drainage will either be maintained or realigned as part of the changes onsite so as to ensure that existing flow routes will not cause problems for the future development.
- We do not want any soakways in contaminated land.

**Reason:** To prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of these swales, soakways and attenuation ponds. We need to have assurance that soakways are not located in areas which coincide with contamination.

**Condition:** If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

**Reason:** This site is located on the Clay-with-flints over the Newhaven and Seaford Chalk (Principal Aquifer) and is within the total catchment area for a Source Protection Zone (SPZ3). Groundwater is at approximately 80 m below the site and we need to protect the Principal Aquifer from any vertical migration of contamination. The previous uses as an RAF base have left a legacy of contamination in made ground and shallow soils that are currently separated from the Principal Aquifer by the Clay-with-flints.

**Condition:** No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a “long-term monitoring and maintenance plan”) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

**Reason:** This site is located on the Clay-with-flints over the Newhaven and Seaford Chalk (Principal Aquifer) and is within the total catchment area for a Source Protection Zone (SPZ3). The previous uses as an RAF base have left a legacy of contamination in made ground and shallow soils that are currently separated from the Principal Aquifer by the Clay-with-flints.

**Condition:** Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no

resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details

**Reason:** This site is located over a Principal Aquifer and pathways caused by deep foundations penetrating through the Clay-with-flints stratum would likely mobilise residual contamination into the top of the aquifer. We would therefore expect that piling would a) not be adopted in areas which coincide with contamination b) that deep penetrative foundations that link the surface soils with the top of the aquifer be avoided.

### **Advice to LPA and Applicant**

**We ask to be consulted on any details submitted in compliance with the above conditions. Please send us a copy of the decision notice.**

### **Groundwater Quality and Contaminated Land**

We have reviewed Chapter 14: Land Contamination and Hydrology and the Card Geotechnics Ltd Remediation Implementation Plan for RAF Daws Hill, High Wycombe dated January 2013. We agree with the remediation strategy that targets the contaminated areas already identified. Any unforeseen contamination encountered during enabling works should be dealt with in an appropriate manner. We not only need to see the validation sampling results for these identified areas but the investigation and validation results for any other contaminated areas identified during enabling works.

### **Waste**

If any controlled waste is to be removed off site, then the site operator must ensure a registered waste carrier is used to convey the waste material off site to a suitably permitted facility. The applicant is advised to contact the Environment Management team at NCCC Office on **03708 506506** or refer to guidance on our website <http://www.environment-agency.gov.uk/subjects/waste>

The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable for any off-site movements of wastes. The developer as waste producer therefore has a duty of care to ensure all materials removed go to an appropriate permitted facility and all relevant documentation is completed and kept in line with regulations.

If any waste is to be used onsite, the applicant will be required to obtain the appropriate waste exemption or permit from us. We are unable to specify what exactly would be required if anything, due to the limited amount of information provided. The applicant is advised to contact the Environment Management team at NCCC Office on **03708 506506** or refer to guidance on our website <http://www.environment-agency.gov.uk/subjects/waste>

The developer must apply the waste hierarchy in a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Government Guidance on the waste hierarchy in England is at: <http://www.defra.gov.uk/publications/files/pb13530-waste-hierarchy-guidance.pdf>

## Thames Water:

### Waste Comments

Thames Water would advise that with regard to sewerage infrastructure we would not have any objection to the above planning application.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

### Water Comments

The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

## Additional comments received by email 5.9.13

. The STW was designed for a population equivalent of circa 178k. Current forecasts indicate that the works is receiving circa. 167k p.e. This is forecast to increase to circa 171k by 2026.

As we are still within the design parameters of the upgrade we do not need to include additional funding in our next business plan for the period 2015 to 2020 to increase the capacity at the STW.

## Thames Valley Police

Natural England:

## **NO OBJECTION**

### **Landscape – Chilterns AONB**

Having assessed this application and consulted the AONB partnership, Natural England does not believe that this proposed development would impact significantly on the purposes of designation of Chilterns AONB.

### **European Protected Species**

Natural England **does not object** to the proposed development. On the basis of the information available to us, our advice is that the proposed development is likely to affect Bats through damage or destruction of a breeding site or resting place. We are satisfied however that the proposed mitigation would maintain the population identified in the survey report.

Bats are a European Protected Species. A licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided through avoidance (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the developer to decide whether a species licence will be needed. The developer may need to engage specialist advice making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development.

Natural England's view on this application relates to this application only and does not represent confirmation that a species licence (should one be sought) will be issued. It is for the developer to decide, in conjunction with their ecological consultant, whether a species licence is needed. It is for the local planning authority to consider whether the permission would offend against Article 12(1) of the Habitats Directive, and if so, whether the application would be likely to receive a licence. This should be based on the advice we have provided on likely impacts on favourable conservation status and Natural England's guidance on how we apply the 3 tests (no alternative solutions, imperative reasons of overriding public interest and maintenance of favourable conservation status) when considering licence applications.

### **Domestic Protected Species**

Natural England **does not object** to the proposed development.

On the basis of the information available to us, the proposed development is unlikely to affect badgers through the damage of a sett or the disturbance of a badger in the sett.

The proposed development is also unlikely to affect reptiles as long as the mitigation outlined in paragraph 5.131 of the ES is followed.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Charlotte Frizzell on 0300 060 1925. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Additional Comments:

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 08 August 2013.

The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal.

The proposed amendments to the original application relate largely to layout, and are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

English Heritage:

**Recommendation**

**The application(s) should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.**

It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you.

Yours sincerely

**Richard Peats**

Inspector of Historic Buildings and Areas

E-mail: richard.peats@english-heritage.org.uk

Bucks Business First:

We are disappointed that the application includes only 2,819m<sup>2</sup> of B1c/B8 use development. Given the recent loss of jobs 15,000 jobs in the district from 2004 ONS, 2013) High Wycombe and the fall in office and industrial floorspace from 2008 to 2012 of 138,000m<sup>2</sup>, reported by the Valuation Office Agency, and the high occupancy of good quality stock in the town we would have liked to see 6,000m<sup>2</sup> as set out in the draft development brief, or at least the 4,314m<sup>2</sup> set out in Deriaz Slater's employment land use study of September 2012.

Any employment space should be developed during the third phase and marketed appropriately

for a reasonable period.

## Thames Valley Police:

I have been involved to some extent in pre application consultations concerning this proposal and as a result there are no police objections to this application. My comments concerning crime prevention are below.

### Flatted Blocks

- **Communal Entrances** - The communal entrances to blocks of flats should form a line of defence acting as a physical barrier to access for outsiders and in this case should be fitted with an access control system with an electronic lock release with entry phone linked to the flats. Communal door entry systems prevent casual intrusion by offenders into the block, where they can break into unoccupied flats during the day without being seen and they also act as a line of defence against bogus callers.  
The method of mail delivery must be designed in from the start. **Tradesman buttons are no longer acceptable and must not be used.** Mail boxes can be either positioned through the wall on the main entrance or be situated in the main lobby and a fob be given to the local Royal Mail sorting office for access.
- **Defensible Space** – I have been having difficulty in finding the detail of the full landscaping proposed around the blocks as some of them appear to be completely ‘open plan’. Where a block has a communal amenity area, e.g. Block 8, then this should be secured with suitable full height fencing and fitted with an appropriate lockable gate. This will increase the security of the block and greatly enhance the residents quality of life by providing a reasonably safe and secure communal amenity area.  
Where this is not possible, e.g. Block A6, then there should still be clarity as to where public space ends and semi private space begins. This can be clearly marked with suitable planting and knee high rails along the side of the pathways. I note that there is some formal hedging proposed which will provide some separation.  
The above measures would encourage residents to feel a sense of ownership and responsibility for their surroundings. It would empower them to take control of these areas as well as greatly increasing the security of the blocks and reducing the potential for crime.

**Physical Security** – Although crime is reducing in High Wycombe, in line with the rest of the Thames Valley Police area, it is far from being a no crime area. Physical security is a critical area when looking to provide a safe and secure development and also assists in achieving a high quality development.

Safer Places – The Planning System and Crime Prevention highlights that crime and anti-social behaviour are more likely to occur if ‘*the target hardening measures, for example for doors, windows and gates, set out by Secured by Design, are not selected to be appropriate to the building and to the crime risk faced.*’

It is likely that all the affordable dwellings on site will be required to achieve Secured by Design Part 2 (Physical Security) which involves fitting security tested doors and windows. I would strongly recommend that all buildings in this development are built to this standard to ensure that the number of victims of crime are kept to a minimum.

These representations are made on behalf of Thames Valley Police in relation to Crime Prevention Through Environmental Design. A separate representation relating to operational and infrastructure requirements may also be made on behalf of Thames Valley Police and Crime Commissioner.

I hope the above comments are of use to you in your deliberations to determine the application and will help the development achieve the aims of the National Planning Policy Framework (NPPF) para 17 – re high quality design and para 58 – re function and designing against crime and fear of crime, Safer Places – The Planning System and Crime Prevention, and Secured by Design principles. However, in the meantime, if you or the applicants have any queries about crime prevention design in relation to the proposals then please feel free to contact me.

## Representations

The Daws Hill Neighbourhood Forum (DHNF) has been designated under the Localism Act in relation to the existing residential areas in the locality. There is an ongoing legal dispute between the DHNF and the Council as to whether the RAF Daws Hill site (and the Handy Cross Sports Centre site) should also be included in their area.

The DHNF has submitted initial comments raising concerns and objections in respect of the EIA process, the need for this quantum of development, traffic congestion, loss of trees, their perception that SQTS is inadequate, the adequacy of sewage infrastructure, the timing of the school provision, the lack of health provision, the proportion of affordable homes, the anathema of including employment uses, the low target for renewables in WDC policy, seeking greater water efficiency, and seeking greater mitigation for the impact of the M40 on noise and air quality.

The High Wycombe Society - Consider this is overdevelopment of the site and that the commercial elements of the scheme are not needed. The architecture is inadequate. Proposed transport package is inadequate. The timing of when the school is provided is questioned. They say sewage infrastructure is inadequate. They are concerned at tree loss.

In terms of the wider community, to date, there have been circa 75 objections received. The main issues raised are traffic congestion and sewage. There are 28 standard letters from Keep Hill residents and an objection from their Residents' Association strongly objecting to the mooted cyclepath connection through the woods. The Chiltern Society have objected to loss of trees and lack of affordable housing. The Flackwell Heath Residents' Association question the adequacy of sewage infrastructure and water supply, the timing of the education provision, the lack of health provision, and the lack of consideration of traffic conditions in Flackwell Heath.

